



Policy

Modern Slavery and Human Trafficking

Revision 0

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Modern Slavery and Human Trafficking Policy

1 POLICY

Leverage Projects is committed to eliminating Modern Slavery and Human Trafficking. This Policy sets out the steps that Leverage Projects has taken to ensure that slavery and human trafficking are not taking place in any part of our businesses or in our supply chains. We are fully committed to promoting transparency and collaboration to eliminate the risks of modern slavery by strengthening our knowledge and raising awareness throughout the company and our suppliers.

1.1 Business Structure and Supply Chains

Leverage Projects is a multi-disciplined project management services provider predominantly to the international energy sector. We focus our activities on supporting the following markets: hydrocarbons, petrochemicals, infrastructure, and general industry.

Based in Abu Dhabi, we primarily operate in three key regions: Asia, the Middle East, and Australia

Currently, our supply chain is managed at an individual project level, which aligns with local business conditions and provides the benefit of strong regional relationship building.

Ensuring supply chain relationships are equitable, fair, and free from the risk of human rights abuses, such as modern slavery and human trafficking, is critical to our success, risk management, and reputation.

1.2 Policies in Relation to Slavery and Human Trafficking

We are dedicated to regularly evaluating and refining our policies and procedures to ensure they remain current and highlight their significance prominently minds.

We last reviewed our policies on slavery and human trafficking in 2024, which include the following:

- Anti-bribery and Corruption Policy
- Whistleblowing Policy
- Employee Code of Conduct
- Supply Chain Code of Conduct
- Code of Conduct
- Supplier Vetting Procedure and Guidance

Central to our business is the Code of Conduct, which embodies our dedication to ethical behavior and integrity in every business interaction. This Code defines our identity, guides our actions, and represents our values, centered around our five core values:

- Integrity and Ethics
- Client-Centric Approach
- Safety Excellence
- Innovation and Continuous Improvement
- Collaboration and Teamwork

We do not tolerate child labor, human trafficking, or any form of forced or compulsory labor. Our commitment is to treat all employees equally and with respect, aiming to create a fulfilling work environment where our workers can thrive, free from any form of discrimination or harassment victimization.

We acknowledge our responsibility and have outlined the expectations for our agents and third parties in our Code of Conduct. We will only use these partners if they are known to uphold standards in line with our Code of Conduct, and we will consistently adhere to an approved process before engaging with them.

Our Code of Conduct reflects our dedication to acting responsibly in every business interaction while adhering to all relevant laws and regulations.

1.3 Governance and Assurance

Throughout the year, we continued to emphasize the significance of our values that support our Code of Conduct and guide our business practices. We accomplished this by ensuring that all relevant employees submitted a declaration affirming their commitment to responsible conduct in all business interactions.

All major current and prospective suppliers are provided with our Supply Chain Code of Conduct, which sets our expectations for suppliers, including upholding human rights and zero tolerance of abuses of human rights, including modern slavery and human trafficking.

We will continue to use the Whistleblowing and Ethics hotline and email. This service is primarily intended for colleagues within the organization, but it is also accessible to the public, including those involved in our supply chain.

1.4 Assessing and Addressing Risk

A robust supply chain is essential for our success. We have established effective procedures for engaging with current suppliers and onboarding new ones. As mentioned earlier, our Supplier Code of Conduct outlines the values and standards that guide our operations and communicates them to our stakeholders and suppliers.

We consistently evaluate every business's supply chain to pinpoint the risks of slavery and human trafficking.

We consistently utilize top-quality materials, products, and services from a leading supply chain, evaluated through stringent supplier vetting processes. By prioritizing a supply chain with internationally recognized accreditation, we ensure adherence to global standards that combat modern slavery and human trafficking.

As a service provider, we are sometimes contractually required to collaborate with a client's chosen supplier, limiting our influence over procurement decisions. We consistently strive to ensure the same level of quality assurance for these vendors as we do for the rest of the supply chain.

Modern slavery and human trafficking can occur anywhere, but they pose a greater threat in countries with weak human rights protections in their legal systems, particularly regarding migrant workers. We are dedicated to identifying, assessing, and monitoring suppliers in these high-risk areas as part of our regular supply chain governance and efforts to mitigate the risk of modern slavery and human trafficking.

We believe that maintaining vigilance is the most effective way to manage risk. Our employees and suppliers adhere to clearly defined standards outlined in the Code of Conduct. Additionally, we've created channels for stakeholders to report concerns to our Compliance team, or to do so anonymously if they prefer, via the Whistleblowing and Ethics hotline. We thoroughly investigate all significant incidents, including allegations related to modern slavery and human trafficking.

1.5 Audit and Assurance

Conducting regular audits of the supply chain, both through internal assessments and external international accreditation bodies, guarantees our adherence to documented governance standards. This process helps us identify any gaps and implement necessary remedial actions. In 2024 there have been no incidents of modern slavery or human trafficking reported.

1.6 Training

We reinforce our Code of Conduct annually with relevant employees to safeguard and promote the dignity of our people and all those who interact with us business.

When employment begins, new employees are guided through company policies and the Code of Conduct. Relevant personnel also sign a declaration indicating their commitment to ethical business practices and compliance with laws and regulations.

We have provided Anti Bribery, Corruption, and Modern Slavery training to senior management and procurement staff throughout our organization businesses.

2 OUR COMMITMENT

- We are dedicated to emphasizing the significance of our values, which underpin our Code of Conduct. To fulfill this dedication, we will provide all employees with access to the Code of Conduct and will mandate that relevant employees submit a declaration affirming their commitment to responsible conduct in all business interactions.
- We will further promote the details of the Whistleblowing and Ethics hotline to ensure that all colleagues across all locations can effortlessly contact the compliance team in a confidential manner.
- Our evolving ESG focus encompasses several key business risks, particularly concerning human rights. In addition to various objectives, we are committed to collaborating with our customers and suppliers to tackle sustainability challenges, foster a zero-harm workplace, and ensure equality across all areas of our business.

Troy Jeanes

Managing Director

01st January, 2024

3 REFERENCES

3.1 Internal Documents

- Anti-bribery and Corruption Policy
- Whistleblowing Policy
- Code of Conduct Policy
- Supply Chain Code of Conduct
- Supplier Vetting Procedure and Guidance

3.2 External Documents

- Modern Slavery Act 2015 (UK)
- Australian Modern Slavery Act 2018 (Australia)
- United Nations Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children (Palermo Protocol) 2009, Amended 2015

4 ABBREVIATIONS AND DEFINITIONS

Term	Definition
ESG	Environmental, Social and Governance

5 VERSION HISTORY

Document Title		Modern Slavery and Human Trafficking Policy			
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0	01-Jan-2024	First Issue	TJ	TJ	TJ

Initials:

TJ: Troy Jeanes, Managing Director

6 AMENDMENT RECORD

This Policy is reviewed to ensure its continuing relevance to the systems and processes that it describes. A record of change and/or contextual additions or omissions is given below:

Page No.	Section	Context	Date
0	N/A	N/A	N/A

7 COMPANY PROPRIETARY INFORMATION

The electronic version of this Policy is the latest revision. It is the individual's responsibility to ensure that any paper material is the current revision. The printed version of this manual is uncontrolled except when provided with a document reference number and revision.