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### **MODERN SLAVERY STATEMENT**

This is the slavery and human trafficking transparency statement ("Modern Slavery Statement") of APR Energy Limited and APR Energy Holdings Limited ("APR Energy"). It is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (the "Act").

The Act prohibits slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). APR Energy is committed to combatting all forms of Modern Slavery that could in any way be connected to our business and supply chains.

Set out below is a description of APR Energy's business and the policies and procedures in place to prevent Modern Slavery taking place in its business and supply chains.

# **About APR Energy**

APR Energy's business involves the rapid delivery of large-scale power solutions and fast-track mobile turbine power. Through our modular, turnkey power plants, we help run cities, countries and industries around the globe in both developed and developing markets. Our mission is to power the progress of the communities we serve by providing cost-efficient reliable electricity, on a fast-track basis, anywhere in the world. Our range of services is extensive and more information can be found <a href="here">here</a>.

The APR Energy group is headquartered in Jacksonville, Florida, and has offices and operations in the Americas, Asia, Africa and the Middle East. Further information on APR Energy's global operations can be found here.

We understand that APR Energy, like any business, is exposed to the risk of Modern Slavery being connected to our business and supply chains and we recognise the seriousness of the issue. As a global business, APR Energy operates in countries which are considered to have a moderate to high level of Modern Slavery risk. Our policies, procedures and other compliance steps are also relevant to reducing the risk of Modern Slavery affecting our business and supply chains. The above said, we are conscious of the need for vigilance during procurement and to keep Modern Slavery risk under review and the potential to enhance our anti-slavery processes further.

Policies, procedures and other compliance steps in respect of the prevention of Modern Slavery

## Our values

APR Energy operates under a set of values which serve as the foundation upon which we work and interact with our co-workers, partners, customers and communities. One of our values is Responsibility and making the safety and well-being of our people, our communities and the environment a priority. Our values are listed <u>here</u>.

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Our Code of Conduct

Our Code of Conduct exists alongside our values and provides more detail on our expectations for employees and other workers, and also third parties who we have relationships with. All of our employees are trained on our

Code of Conduct.

Central principles of our Code of Conduct include compliance with all laws and "empowering with integrity", which involves making ethical choices at all times. We also encourage the reporting of any activities that may violate any

laws, regulations, company policies or the Code of Conduct and we have in place an ethics and compliance

hotline for such reports. Further detail on this hotline is below.

Procurement policy

APR Energy has in place a procurement policy which requires, amongst other criteria, that all procurement activity is conducted on the basis of integrity. Purchases shall also only be made from suppliers on the APR Energy approved vendor list and such approval is gained following an assessment process on the SAP Ariba system. In addition, all procurement decisions are made by way of a delegation of authority process and written purchase

orders are a mandatory step. These procurement processes increase controls in respect of our direct suppliers.

Due diligence

APR Energy's processes require due diligence for every new business venture, as well as any entity hired or retained by APR Energy in a representative capacity. These procedures are currently focused on bribery and corruption risks, however are relevant to assessing the reputational risk of the supplier and their compliance

processes. Steps include interviews with proposed suppliers and screening of entities and/or individuals.

Other compliance policies

In addition to our Code of Conduct, APR Energy has other policies which are relevant in establishing and encouraging an ethical environment. These include policies in respect of anti-bribery compliance and anti-money

laundering, and are included in APR Energy's employee handbook.

Training

All APR Energy employees are required to complete a course in respect of our Code of Conduct. Training is also provided in respect of anti-bribery and anti-money laundering which raises awareness in respect of the need to

assess suppliers. APR Energy has not introduced specific Modern Slavery training however this is under review.

Whistleblowing



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APR Energy encourages employees and other workers to report any activity, behaviour or situations that raise a concern, including in respect of the principles set out in APR Energy's Code of Conduct. Reports can be made to supervisors, the APR Energy Legal Department or through the ethics and compliance hotline (US 1-877-237-4362 / Non-US 1-904-404-4540).

### Further enhancements

Enhancements to the processes of APR Energy in respect of Modern Slavery are being reviewed.

# Approval

This statement is made pursuant to section 54(1) of the Act for the financial year ending 31 December 2018 and has been approved by the board of Directors of APR Energy Limited and APR Energy Holdings Limited on March 25, 2019.

For and on behalf of APR Energy Limited

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