



SLAVERY AND HUMAN TRAFFICKING STATEMENT

for Financial Year ended 31 December 2019

This is the slavery and human trafficking statement of Kellas Group Holdings Limited (the "Parent") applicable to the year ended 31 December 2019 and each of its following subsidiaries as at that date:

- Kellas Group Finance Limited
- Kellas Topco Limited
- Kellas Holdco Limited;
- Kellas Parentco Limited;
- Kellas Midstream Limited;
- Kellas CATS Limited;
- CATS North Sea Limited;
- Kellas North Sea 1 Limited;
- Kellas North Sea 2 Limited;
- NSIP (ETS) Limited;
- HGS Parentco Limited; and
- Humber Gathering System Limited

The Parent was the ultimate holding company of the above noted subsidiaries as at 31 December 2019 (the above noted subsidiaries together with any additional entities from time to time which are subsidiaries of the Parent (directly or indirectly) shall be known as the "Group").

A. INTRODUCTION FROM THE BOARD OF DIRECTORS OF THE PARENT

We are committed to ensuring that we combat slavery and human trafficking throughout the Group, in a manner appropriate in the context of the business of the Group, to ensure the Group's compliance with the law.

Following a review of how the Group performs its business and how it wishes to continue to perform its business the Group revised its commitment messages during 2019. The Group now operates on the basis of one clear Purpose and 3 Principles, which are the guiding values that support the Group in achieving its purpose.

Purpose: To be an energy infrastructure company delivering safe, reliable and innovative solutions for its customers, and growth for its stakeholders.

Principles:

Integrity – Everything Kellas does is underpinned by honesty, trust and credibility; the ethos is always to "do things right, and do the right thing".

Partnership – Collaboration, cooperation, agility and mutual interest are consistent across all of Kellas' relationships: with employees; customers; regulators; and operating partners. The goal is to deliver win-win results for all partners and stakeholders.

Tenacity – Determination to succeed, coupled with experience and professionalism, is what allows Kellas to deliver excellent results, add value and make a success of everything the business does, even when faced with the greatest of challenges.

The Group is committed to these principles, which help to inform how the Group's people are expected to behave, as individuals and collectively as a business.



B. ORGANISATION'S STRUCTURE

The Group has a global annual turnover of in excess of £36 million.

C. OUR BUSINESS

The Group provides hydrocarbon gathering, transportation and processing services to the oil and gas industry in the North Sea. Our business is organised into business units each of which is responsible for either the management and operation of oil and gas infrastructure assets owned (in whole or part) and operated by us or the general business development activities of the Group. Kellas Midstream Limited, a Group company, is the Group employing entity and provide management and support services to the rest of the Group.

D. OUR SUPPLY CHAINS

The Group's management team are responsible for the delivery of the business of the Group.

The business of the Group has been designed such that the day to day operational activities associated with the infrastructure assets operated by the Group are performed by third party organisations with the capabilities and expertise to perform such services. These third party suppliers have been appointed following rigorous tendering and review processes and all have considerable experience of the work they have been appointed to perform. These third party organisations themselves may rely on the provision of services from third parties. The Group maintain close relationships with our suppliers and monitor the activities carried out by them on our behalf on a continuous basis. The Group audit these suppliers on a regular basis against their contractual undertakings and which audit process includes the review of any sub-contractor assessment process followed by them when appointing key contractors.

In addition to the appointment of the above mentioned third party operating suppliers the Group also rely, for the proper performance of its business, on the provision by third party suppliers of financial, technical, legal and other operational services. These service providers are appointed as and when the needs of the business so require. The Group maintain close relationships with our suppliers and monitor the activities carried out by them on our behalf on a continuous basis. The Group assess the suitability of and audit these suppliers on a regular basis against their contractual undertakings.

E. OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.



F. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we:

- carry out due diligence in respect of, and audit, our supply chain to identify and assess potential risk areas in our supply chains and mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and
- protect whistle blowers.

G. SUPPLIER ADHERENCE TO OUR VALUES

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we continuously monitor our supply chain's compliance. This consists of regular performance management meetings with, and audits of, our existing supply chain and a detailed tendering process prior to engaging our supply chain. This process is supported by the wider business and we only engage with suppliers which are well established entities with strong reputations of good management.

H. TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

I. OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

Our procurement processes require that a legal advisor is involved in the award of all contracts and that a rigorous review process is carried out as part of the tendering exercise at which point the sub-contracting strategy of the relevant potential service provider is considered.

J. FURTHER STEPS

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains we intend to formalise a detailed due diligence procedure for use within the Group, to help us more consistently assess the risks of slavery and human trafficking within our supply chain and to understand and assess the effectiveness of the steps and action taken by companies within our supply chain to avoid instances of slavery and human trafficking and to ensure we monitor and regularly review those risks and actions.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2019.

Director, for and on behalf of
KELLAS GROUP HOLDINGS LIMITED

Date: 30th April 2020