

1. Introduction

SAND Geophysics Limited ("SAND", "we", "our" or "us") is committed to combating slavery and human trafficking in all its forms, both within our own business and throughout our wider supply chains. This statement is published in support of the Modern Slavery Act 2015 and sets out the steps we have taken, and intend to take, to understand and address the risk of modern slavery and human trafficking connected to our operations.

SAND's annual turnover is currently below the £36 million threshold at which publication of a modern slavery statement becomes a legal requirement. We nonetheless believe that transparency and responsible business conduct are important regardless of company size, and we publish this statement voluntarily.

2. Our Organisation and Supply Chains

SAND is an independent limited company and does not form part of any wider group structure. We are a specialist provider of shallow, high-resolution marine geophysical survey, data processing and consultancy services, operating from our office in Hamble-le-Rice, Southampton, and delivering projects for clients internationally.

Our supply chain is principally made up of technical service providers, survey and vessel contractors, equipment suppliers, agencies, freelance specialists, and logistics providers. The significant majority of our suppliers are UK-based, with a smaller number located in the EU, USA and, occasionally, further afield in connection with specific offshore projects.

3. Our Policies

Our commitment to preventing modern slavery is supported by a number of internal policies and processes, including:

- our Anti-Corruption and Bribery Policy, which sets standards of ethical conduct for our own staff and for suppliers, contractors and business partners acting on our behalf;
- a supplier approval process, operated in accordance with ISO 9001, ISO 45001 and ISO 14001, which all suppliers must satisfy before being engaged;
- recruitment procedures that include right-to-work checks and verification of identification for all directly engaged staff; and
- a Whistleblowing Policy that enables employees to report concerns, including concerns relating to modern slavery, in confidence.

These policies are reviewed alongside this statement and updated as necessary to reflect changes in our business or in relevant legislation.

4. Due Diligence and Risk Assessment

We have examined our own business and, so far as is reasonably practicable, the businesses within our supply chain, and confirm the following:

- no relevant offence relating to slavery or human trafficking has been identified within our own business;
- we have made enquiries of businesses that supply directly to us and are confident that no relevant offence is being committed within those businesses; and
- so far as is reasonably practicable, we have examined our wider supply chains and have found no evidence of slavery or human trafficking.

In assessing risk, we take account of factors including the extent to which suppliers rely on agency, temporary or migrant labour, the geographic regions in which they operate, and the extent to which work is sub-contracted. On this basis and reflecting the technical and specialist nature of the services we procure, we do not currently consider our supply chain to fall within a high-risk sector. We recognise, however, that risk can change over time, particularly given the international and occasionally multi-tiered nature of offshore project supply chains, and we keep this assessment under regular review.

Where reasonably practicable, we seek assurance that businesses within our supply chain have made an equivalent statement in relation to slavery and human trafficking, and larger suppliers engaged by SAND are themselves subject to the Modern Slavery Act 2015.

5. Our Workforce

All directly employed staff are engaged only after satisfactory completion of our recruitment process, which includes verification of identity and the right to work in the UK. Freelance personnel engaged directly, or through an agency, are required to provide equivalent identification and supporting documentation before commencing work for SAND.

6. Training and Awareness

We are committed to ensuring that staff involved in recruitment, procurement and supplier management are able to recognise the signs of modern slavery and labour exploitation.

7. Raising a Concern

We encourage all employees to report any matters relating to slavery or human trafficking in our supply chains of which they become aware, in accordance with our Whistleblowing Policy.

Suppliers, contractors and members of the public may also raise a concern by emailing accounts@sandgeophysics.com or by contacting our office directly.