



FRANK'S INTERNATIONAL

Modern Slavery Statement 2020

FRANK'S INTERNATIONAL – MODERN SLAVERY STATEMENT 2020

RESPONSIBLE AND ETHICAL PROCUREMENT

With a diverse, global workforce spanning six continents, Frank's International is an industry leader in tubular running services, tubular fabrication, drilling technologies, and specialty well construction and well intervention solutions with a focus on complex and technically demanding wells.

Commitment

Frank's is committed to ethical and responsible procurement practices, including detecting and mitigating the risk of modern slavery and human trafficking and enhancing the positive social and ethical impacts of our supply chain.

Policies

This commitment influences our [QHSE Policy](#), [Approved Vendor Policy](#), [Code of Business Conduct and Ethics](#) and our [Anti-Bribery Policy](#).

Frank's operates under a robust Code of Business Conduct and Ethics and Anti-Bribery Policy, which set guidelines for our relationships with Frank's customers, suppliers and government officials. Frank's also operates the [Compliance & Ethics Hotline](#), which is administered by an independent, third-party supplier and allows our personnel to report, in confidence, breaches of our Code of Business Conduct and Ethics - which includes human rights and modern slavery concerns arising in the course of our business - 24 hours a day, seven days a week. Reported concerns are promptly investigated by Frank's International. The Code of Business Conduct and Ethics, the Anti-Bribery Policy and the Compliance & Ethics Hotline promote the core principles we advocate and uphold in day-to-day business operations such as trading responsibly, fair competition, anti-corruption and anti-bribery, working against modern slavery and forced labor, preventing harassment, discrimination and conflict of interest.

Training

As part of our Code of Business Conduct and Ethics program, Frank's has designed a training and certification program for our employees covering all relevant compliance issues, with themes ranging from global anti-corruption to diversity and respect. All employees, on an annual basis, are required to certify

their personal commitment to compliance with all applicable laws and regulations and adherence to the highest ethical standards. This annual process helps us monitor compliance with the policies and ensures all employees are aware of their obligation to report conduct that conflicts with the Code of Business Conduct and Ethics or applicable laws.

Corporate Structure for Ethical Procurement

The Frank's corporate structure allows for the effective creation and implementation of ethical trading policies and monitoring of compliance with the Code of Business Conduct.

At the executive level, the Frank's Senior Counsel and Global Compliance Director leads ethical and sustainable procurement policies and procedures. He works alongside the Global Supply Chain Director to ensure that a proactive approach to enforcing and maintaining ethical policies and procedures is embedded and reflected in the daily activities of Frank's personnel worldwide.

Our Executive Management Team is supported by the Frank's Legal, Commercial and Procurement, Quality Assurance/Quality Control and Human Resources departments. They are instrumental in engaging with suppliers, planning short to long-term supplier relations, monitoring supplier performance, especially in relation to ethical practices, identifying potential risks and developing and implementing corrective action plans. Together they focus on developing and maintaining effective supplier audit practices, revision of relevant vendor documents and records, and implementation and closure of any corrective actions.

Ethical Procurement Practices

Frank's has taken a proactive approach to eliminate all risks pertaining to the issues of unethical activities in our supply chain, either as a direct or indirect result of procurement practices.

Due Diligence and Risk Assessment

Through the review of supplier contracts, Frank's can identify and focus on all parts of our business and supply chain areas at risk for ethical concerns. To ensure the highest standards of ethical conduct, Frank's performs enhanced due diligence on suppliers identified as high-risk. As part of that due diligence process, the identified supplier is required to complete the [Frank's Anti-Corruption Due Diligence Questionnaire](#). Frank's reviews this questionnaire and other materials, including a background investigative report, and determines whether the supplier would be an appropriate business partner. Only after this assessment is a supplier permitted to engage in business activities with Frank's. [The Approved Vendor Policy](#) provides guidance on steps required for successful assessment of potential suppliers and efficient review of existing contracts.

Every supplier is required to complete the Vendor Setup Request Form. This contains a section on Human Rights & Labor Conditions for suppliers to complete, and requests open ended information on how suppliers assess and manage the protection of human rights and labor conditions.

The Vendor Setup Request Form is then assessed and approved by relevant department functions before being processed by our dedicated vendor approval team.

We have completed a global exercise for the identification of all Frank’s agents, distributors or resellers, business consultants or intermediaries and venture partners that may require any additional reviews, due diligence and/or documentation.

To ensure ethical policy in our supply chain, Frank’s continuously revises and strengthens our global compliance program, which includes the important task of risk assessments and audits for our new and existing suppliers, including providing immediate responses to significant risks identified during an audit. Supplier contracts are routinely audited and managed by our QHSE team.

Frank’s works closely with our suppliers, customers, employees and shareholders to ensure our supply chains are transparent and ethical; to develop and promote sustainable work environments for all our stakeholders.

Looking ahead

We will continue the policies and actions described in this statement and will continuously work to improve our processes to ensure that modern slavery has no place within our supply chain or any part of our business.

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 current year.

Approved By:		Date:
	Michael C. Kearney	June 2020
	Chairman, President, and Chief Executive Officer	