



Modern Slavery and Human Trafficking Transparency Statement

for the year ended 31 December 2016

Compliance Statement

This statement sets out the procedures that Hunting PLC (“Hunting” or “the Group”) has implemented during 2016 to evaluate the risk of slavery and human trafficking occurring within the Hunting group and within its known external supply chain. This statement also outlines the procedures to address slavery and trafficking which the Group intend to develop in future years.

In compliance to Section 54 of the Modern Slavery Act 2015 this statement, approved by the Hunting PLC Board of Directors on 28 February 2017, was signed on behalf of the Board by Dennis Proctor, Hunting PLC’s Chief Executive.

Further information on Hunting’s ethical employment and trading policies can be found at <http://www.huntingplc.com/environment-and-society/our-policies/code-of-conduct.aspx>.

This statement also provides compliance to the Modern Slavery Act for the following UK subsidiaries of the Hunting group:

Hunting Energy Holdings Ltd
Hunting Energy Services Ltd
Hunting Energy Services (International) Ltd
Hunting Energy Services (UK) Ltd
Hunting Energy Services (Well Intervention) Ltd
Hunting Welltonic Ltd
Hunting Energy Services Overseas Holdings Ltd
Hunting Pension Trust Ltd
Hunting Oil Holdings Ltd
HG Management Services Ltd
Hunting Knightsbridge Holdings Ltd
Huntfield Trust Ltd
Huntaven Properties Ltd
Stagline Ltd



Dennis Proctor, Chief Executive
13 March 2017

Group Structure and Businesses

Hunting is an international energy services group, providing high-end products and services to the global oil and gas industry. The majority of our revenues are derived from partners operating within the upstream segment of the energy industry.

Hunting's global businesses employ approximately 2,107 members of staff in 13 countries. In 2016, Hunting reported revenues of \$455.8 million.

Hunting's global businesses are organised into four operating segments:

Well Construction – comprising of the Group's Premium Connections, Drilling Tools, Advanced Manufacturing Group, Specialty Supply, Trenchless and Construction OCTG business units.

Well Completion – comprising of the Group's Perforating Systems, Accessories & Manufacturing and International Completion business units.

Well Intervention – comprising of the Group's Subsea and well intervention business units.

Exploration & Production – comprising of the Group's US production business unit.

Supply Chains

The oil and gas sector is a global industry and as a supplier to this industry Hunting's customer and supplier chain network involves relationships with many operators within the market.

Certain of the Group's product lines are manufactured and supplied directly to exploration and production companies, which are termed "end-users" as these customers are ultimately responsible for the exploration, development, production and maintenance of oil and gas reserves. In 2016 approximately 30% of revenue came from this section of our customer base. Other major customers of the Group are international oil and gas service groups, where it is common that the end-user of our products is not known to us. In 2016 approximately 60% of revenue came from this section of our customer base.

Major suppliers to the Group include global steel mills and raw material suppliers.

Policies

Hunting has published a number of policies which describe the Group's approach to commercial business and the way it interacts with all of its stakeholders, whether that is employees, customers or suppliers.

In 2011 the Group published its Code of Conduct which can also be found at <http://www.huntingplc.com/environment-and-society/our-policies/code-of-conduct.aspx>. The Code covers a broad range of ethical policies which our employees and business partners are encouraged to adhere to.

In 2017 Hunting published its Ethical Employment and Trading Policy which commits the Group to a zero tolerance stance on slavery and trafficking within the organisation and encourages our business partners to share in these values. This policy can be found at the same website location as the Code of Conduct.

Hunting also has bribery and corruption and sanctions compliance policies in place. Training on these policies is also part of our induction programme for employees, where relevant.

Whistleblowing Service

Since 2011, Hunting has operated a confidential reporting service whereby employees can report matters of concern including health, safety, employee welfare, ethics or any other business practice.

Reports to this service are reviewed by the Group Company Secretary and Senior Independent Director, who direct appropriate actions in response to these reports.

Training

Hunting is in the process of developing an internal Code of Conduct training course which will be rolled out to all employees. The course will include training on slavery and trafficking awareness and will encourage confidential reporting of any matters of concern.

Risk Assessment

In 2016 each business unit within the Group completed a risk-based assessment of its major customers and suppliers.

The assessment required each business partner to be evaluated on a “country risk” basis, where those countries (which are categorised by ratings published with the US Government’s annual ‘Trafficking in Persons’ report located at <https://www.state.gov/documents/organization/258876.pdf>) deemed to be higher risk locations for slavery and trafficking were highlighted.

Analysis of “supply chain transparency risk” was also applied to enable each business to understand where our business partners sit in the industry supply chain whether that be as an “end-user” or “materials originator”. Approximately 1,000 customers and suppliers to the Group were evaluated by this process.

Each business partner highlighted in this process has been sent copies of our Ethical Employment and Trading Policy and Code of Conduct to encourage all our major business partners to adopt these ethical initiatives.

In parallel to this exercise the Group has also completed due diligence on its global employment practices to confirm its recruitment and ongoing employment procedures. The conclusion of this internal exercise was that slavery and trafficking was a low risk to the Hunting group, given the main locations of the Group’s operations being in North America, Europe and Singapore. As noted above, all employees will be required to complete a Code of Conduct training course during 2017 which intends to highlight key elements of the Modern Slavery Act, but also to encourage vigilance to its global compliance both internally and externally.

Future Initiatives

The risk assessment as noted above will be repeated on a six monthly basis to ensure our policies are communicated to existing and new business partners.

In 2017, additional due diligence procedures on higher risk partners or geographies is intended to be developed.

Further, Hunting's Internal Audit function will develop procedures for ensuring business partner identification and analysis is appropriate and reported accurately to the Board.

On behalf of the Board of Hunting PLC:

Dennis Proctor
Chief Executive

13 March 2017