



**PE Limited**

Engineering & Geological Software Development

## **Modern Slavery Statement**

*For the financial year ending 30 September 2025*

### **Introduction**

This statement is made pursuant to the Modern Slavery Act 2015 and outlines the steps taken by PE Limited during the financial year ending 30 September 2025 to prevent modern slavery and human trafficking in our business and supply chains.

PE Limited has a zero-tolerance approach to slavery and human trafficking. We are committed to acting ethically and with integrity in our business relationships and to implementing and maintaining effective systems to minimise the risk of modern slavery within our operations and supply chains.

This statement describes our organisational structure, policies, risk management and due diligence processes in relation to modern slavery.

### **1. Our Structure, Business and Supply Chains**

#### **Structure**

PE Limited is a UK-based software engineering company specialising in petroleum engineering and structural geology software solutions. Founded in 1990, we develop advanced modelling and optimisation software and provide technical consultancy and training services to clients operating globally within the energy sector.

PE Limited operates primarily from the United Kingdom and works with customers and commercial representatives internationally. The group operates through PE Limited and its subsidiaries.

Our operations are primarily professional, and technology based. Our workforce primarily consists of directly employed engineers, software developers, geoscientists, consultants and corporate support staff working across research and development, product development, product support and administrative functions.

#### **Supply Chains**

As a software and services organisation, our supply chains are relatively limited in scale and primarily include:

- IT infrastructure and software service providers
- Professional advisers and consultants
- Office facilities and facilities management providers
- Recruitment agencies and employment service providers

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**3000 Cathedral Hill, Cathedral Square, Guildford, United Kingdom, GU2 7YB**

Tel: +44 131 474 7030 Fax: +44 131 474 7031 Email: [edinburgh@petex.com](mailto:edinburgh@petex.com) Website: [www.petex.com](http://www.petex.com)

Registered Office: 3000 Cathedral Hill, Cathedral Square, Guildford, United Kingdom, GU2 7YB

Registered in England & Wales: 6429211



- Commercial representatives in certain jurisdictions

We do not manufacture physical goods. However, we recognise that modern slavery risks can arise within indirect supply chains, particularly where services involve outsourced labour or operate in higher-risk jurisdictions.

## **2. Our Policies**

PE Limited is committed to acting ethically and with integrity in all business dealings and relationships.

Our internal governance framework includes:

- Equality, Diversity and Inclusion Policy
- Whistleblowing Policy
- Grievance procedures
- Recruitment and right-to-work verification processes
- Statement of Business Principles and Ethics

These policies establish expectations for employees, contractors, agents and representatives and are reviewed periodically to ensure they remain effective.

Employees can raise concerns through established internal reporting channels.

## **3. Assessing and Managing Risk**

Due to the nature of our business, we consider the inherent risk of modern slavery and human trafficking in our operations to be low. We take our responsibility to identify and respond to any incidents of modern slavery and human trafficking seriously.

Employees are recruited through formal processes and are subject to right-to-work verification and standard employment protections.

Potential areas of indirect risk may include:

- Third-party recruitment agencies
- Overseas commercial representatives
- Facilities management and outsourced services
- Technology hardware supply chains

Risk considerations may include:

- The geographic location of suppliers
- The nature of services provided
- The potential use of subcontracted labour
- The structure of contractual relationships



We may seek contractual assurances that suppliers comply with applicable labour laws and ethical standards.

#### **4. Due Diligence and Remediation**

We undertake proportionate due diligence when engaging new suppliers and representatives. This may include:

- Reviewing the nature and ownership of the business
- Considering geographic and sector risk
- Incorporating contractual terms where appropriate
- Communicating our expectations regarding ethical conduct

If concerns relating to modern slavery were identified, appropriate steps may include:

- Investigating the matter
- Engaging with the relevant supplier or representative
- Considering corrective action
- Ending the relationship where appropriate

We aim to support lawful and ethical labour practices across our business relationships.

#### **5. Awareness**

We recognise that awareness is an important component of preventing modern slavery and human trafficking.

Employees have access to internal reporting mechanisms, including a whistleblowing procedure, should concerns arise.

We will continue to consider proportionate measures to maintain awareness of modern slavery risks in line with the nature and scale of our operations.

#### **6. Monitoring and Effectiveness**

PE Limited recognises that preventing modern slavery requires ongoing oversight and continuous review of our policies, procedures and business relationships. Our approach includes:

- Annual review of this statement
- Consideration of supplier and representative relationships
- Senior management awareness of relevant risks
- Availability of internal reporting mechanisms



## PE Limited

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During the reporting period, no instances of modern slavery or human trafficking were reported within our operations.

We will keep our approach under review and make appropriate adjustments as required.

PE Limited remains committed to maintaining high standards of ethical conduct and respect for human rights across its business activities

### Approval

This statement has been approved by the Board of Directors of PE Limited on 17<sup>th</sup> March 2025 and is signed on its behalf by:

Lynn Marshall, Director, PE Limited

17/03/2026

Date