

# Our Responsible Future



# Foreword

We champion responsibility across everything we do, and we promote others who do the same. We work proudly across oil and gas and renewables because we can responsibly make a difference to the world's biggest energy and climate challenges.



I am proud to be in a position to introduce our first Communication on Progress following a two-year period of major business transformation.

Our transformation started with making responsibility a core part of our vision and one of our three headline values. This allowed us to embed responsibility, in all its forms, in our decision making, including:

- › Working on energy projects which are economically, technically, environmentally, socially and ethically sustainable.
- › Investing in people and providing the framework to support mental health and physical wellbeing, engagement, training, work-life balance, helping people thrive and be the best version of themselves.
- › Actively promoting diversity and inclusion.
- › Meeting our commitments under the UN Global Compact (the Compact) and delivering tangible progress towards the UN Sustainable Development Goals (the Goals).

Our Leadership Team is committed to continuing to embed and promote all 10 Principles of the Compact in support of human rights, labour, the

environment and anti-corruption. We are also contributing to the Goals both through our actions on the 10 Principles and through our external business activities as we, and our clients, navigate the Energy Transition.

**Stephen Swindell**  
Managing Director

**WE SUPPORT**



# Communication on Progress

Serving as our annual Communication on Progress (CoP) to the UN Global Compact, this document provides information on our sustainability-related policies, programs and performance.

## Active CoP

Following the Compact's automatic extension to CoP submission dates due to the Covid-19 pandemic, this report covers the period from our initial commitment in 2019 to the end of 2020 and is classed as an 'Active' CoP. It has been prepared by staff experienced in non-financial reporting and subjected to our internal assurance procedures; external assurance will be considered for future CoPs.

Xodus is continuously working to embed and promote all 10 Principles in support of human rights, labour, the environment and anti-corruption. We are also contributing to the UN Sustainable Development Goals both through our actions on the 10 Principles and through our business activities as we and our clients navigate the Energy Transition.

# Corporate Sustainability Governance & Leadership

Our Leadership Team supports the UN Global Compact and oversees our efforts on human rights, labour rights, the environment and anti-corruption, while contributing to the Sustainable Development Goals (SDGs).

We have integrated sustainability into the way we operate. Our Vision, that *together, we will deliver a responsible energy future*, and Values of *Trust, Responsibility* and *Excellence* underpin our commitments. The Leadership Team has overall responsibility for the direction and outcomes of our commitment strategy which is coordinated by a Steering Group comprising managers and specialist advisers.

## Stakeholder Engagement

Our shareholders, Subsea 7 (also a UN Global Compact participant) meet with both our Leadership Team and other business managers and specialists to ensure appropriate alignment of priorities including sustainability, energy transition issues and improvement strategies.

Our wider engagement includes our own people, our clients, our suppliers, multiple regulatory bodies and authorities, industry associations, non-governmental organisations and local communities.

Proactive engagement with our key stakeholders provides fundamental inputs into determining which issues are most material to Xodus' current and future business success.

## Embedding the 10 Principles

Our management systems are certified for quality (ISO 9001), environment (ISO 14001) and health and safety (ISO 45000). To help embed the 10 Principles, our Steering Group undertook a systematic Gap Analysis against them and concluded that, although a lot of the required policies, strategies and procedures were already in place, we could be more ambitious in our approach.

Similarly, we mapped the SDGs against our existing arrangements and aspirations and assessed our capacity for making maximum impact on them. This materiality assessment prioritised six SDGs and identified a means of leveraging our commercial activities towards their achievement. However, as this process was only completed in December 2020, we have yet to define suitable SDG benchmarks and determine what metrics are needed to showcase the anticipated outcomes.

## Value Chain Implementation

As an energy company specialising in design, engineering, environmental and other technical consultancy disciplines, Xodus itself has limited impacts so our vendor chain is a potentially bigger contributor to them, particularly in relation to environmental factors. To address this, we are developing an improved contractor and supplier management system to tackle any potential concerns or issues relating to our commitment to the 10 Principles and Global Goals.



# Our Sustainability Benchmarks

We have created a set of nine interim benchmarks, based on the models set out in the SDG initiative, in order to monitor and report our performance.

We are currently developing a wider range of metrics to support our next Communication on Progress.

**1. Zero Incidence** of human rights abuse or complicity resulting from Xodus activities or business relationships (Human Rights Principles)

**2. Zero Tolerance** for discrimination, racism or harassment in any form (Human Rights Principles and SDG 5)

**3. Continual Performance Improvement** in inclusivity, diversity and gender balance across all levels of Xodus (Principles 3, 4, 5 and 6 and SDG 5)

**4. 100%** of workforce across the organisation and contracted office service workers earn a Living Wage, extending to other vendors and countries as appropriate (Labour Principles, supports SDG 8)

**5. Continue to Develop and Improve** the global employee Wellbeing support program (Labour Principles, supports SDG 3)

**6. Zero Incidence** of preventable, reportable work-related injury or physical or mental health conditions throughout the organisation (Labour Principles, supports SDG 3)

**7. Provide Xodus Staff** with quality technical, commercial, professional skills training and development, and accreditation opportunities in recognised credited chartership programmes (Labour Principles, supports SDG 4)

**8. Set Ambitious Target** to reach Net Zero Emissions before 2045 and take urgent action to maximise reductions, neutralise any residual emissions and potentially compensate for climate change impacts in line with evolving global standards and criteria (Environmental Principles, supports SDGs 13 and 14)

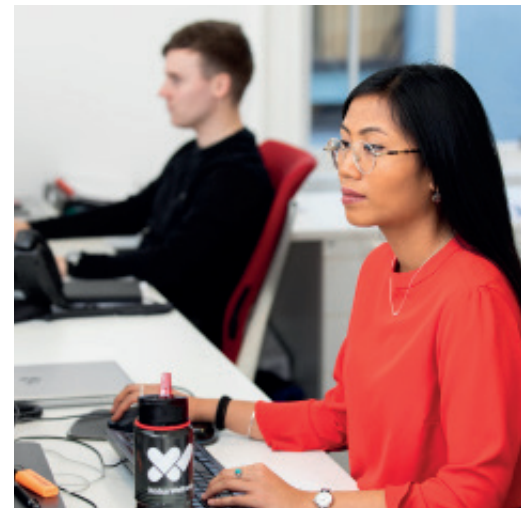
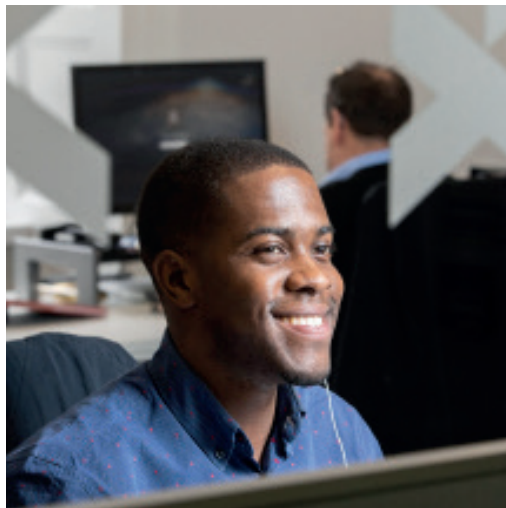
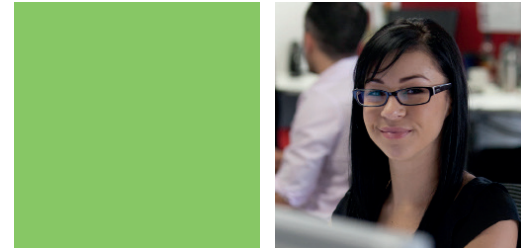
**9. Zero Tolerance** for any breach of Xodus Anti-Bribery and Corruption and/or Code of Conduct rules by Xodus personnel, clients, vendors or other parties representing the company (Anti-Corruption Principle, supports SDG 16)

## Covid-19 Impacts

The pandemic disrupted the company's business as usual profile, with clients suspending or cancelling ongoing and planned projects for prolonged periods and switching their focus towards improved internal efficiencies and adapting to enforced Covid-19 restrictions on work activities. This had a knock-on effect on our business, primarily in regard to commercial activities; however, it also triggered a potentially fundamental change in our core market that has resulted in a growing opportunity pipeline for work supporting the Energy Transition, renewable energies, new technologies and digitisation services.

Xodus quickly committed to manage Covid risks to its personnel in the offices and in both business and commute travel, effectively closing all offices except for essential tasks. Facilitating efficient 'Working from Home' for most of the staff required speedy provision of the necessary IT equipment and software. Staff were required to undertake DSE assessments of their domestic 'office' arrangements and Xodus ramped up its Wellbeing support program. Xodus participated in the UK Government-subsidised Furlough scheme for a proportion of its staff, but continued to honour employment contracts and top up salaries to their normal levels; however, some limited downsizing in the workforce was unavoidable.

Efforts continued, but some disruption to the actions on the Compact's Principles and Global Goals was inevitable, notably in regard to data collection and particularly the atypical conditions for compiling the base year GHG inventory needed for setting science based targets. At the time of writing, there is still uncertainty about when any return to 'normal' life let alone business conditions will happen. Nevertheless, Xodus is preparing for eventualities with optimism for the future of the business and our people.



# Human Rights

## Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights.

## Principle 2:

Make sure that they are not complicit in human rights abuses.

### Robust Human Rights policies and procedures

In addition to our policies (see right), we have committed to SDG 5 on Gender Equality and have prioritised the roll out of strategic initiatives on both Diversity & Inclusivity and Wellbeing.

Key documents accessed via Xodus Integrated Quality (XIQ) intranet site.

- › Human Resources Policies & Procedures
- › Statement of Principles
- › Code of Conduct
- › Anti-Bribery Policy
- › Data Protection Policy
- › Modern Slavery and Human Trafficking Statement

### Effective management systems to integrate human rights principles

Our commitments are integrated into our management systems. We have the internal knowledge and capabilities and we can provide human rights advice and assurance services to clients within environmental and social assignments. We have robust Human Resources and Occupational Health and Safety programs in place to respect human rights and protect our people. We have initiated a scoping exercise to inform our Human Rights Due Diligence program and the enhancement of our contractor and supplier management and country entry processes.

### Effective monitoring and evaluation of human rights integration

Regular audits and management reviews ensure that we adhere to all applicable laws and regulations, our Code of Conduct and internal standards. ISO 9001, 14001 and 45011 certification confirms that we remain in legal compliance, internal processes are well implemented, targets are set and attained, and our reporting is timely and accurate. Our people are encouraged to raise concerns with management initially or resort to our whistleblower system (24/7 free confidential helpline), with all concerns being duly investigated.

## Outcomes

Zero records of allegations, claims or instances of any human rights abuse or complicity resulting from Xodus activities or business relationships or any breaches of our Modern Slavery and Human Trafficking policy.

Our Benchmark No. 1 is met.

# Labour

## Principle 3:

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

## Principle 4:

Elimination of all forms of forced and compulsory labour.

## Principle 5:

The effective abolition of child labour.

## Principle 6:

The elimination of discrimination in respect of employment and occupation.

### Robust Labour policies and procedures

In addition to our policies (see right), we continue to commit to treating our people and those that work with us fairly and with respect. Consequently, terms and conditions of employment - including pay and benefits - are fully compliant with national legislation in all countries in which we are an employer.

### Additional programmes

Diversity & Inclusion / Wellbeing / Learning & Development / Living Wage

### Effective management systems to integrate labour principles

No independent unions and/or works councils. No barrier to union membership for staff. Formal communications and feedback protocols are in place for our people to raise concerns and submit grievances. Pay for entry-level positions is above local minimum wage levels, and salaries are higher than national averages in the countries we work in. Conditions of work and employee benefit programs add to our attractiveness as an employer. Comprehensive career development initiatives and skills training are available to ensure that all employees achieve their potential. We are a diverse business with 34 nationalities represented in our workforce. Annual HSE Objectives aligned to our commitments to the Principles and SDGs are set and tracked through to achievement. Our Safety Committee meets every two months and HSE arrangements are subject to internal audit and external assessment for ISO 45001 certification, plus annual top management reviews.

### Effective monitoring and evaluation of employment standards and labour rights integration

Regular reviews ensure that we adhere to all applicable labour and OHS laws and regulations and that our internal standards remain compliant and aligned with good international industry practices.

Key documents accessed via XIQ intranet site:

- › Human Resources Policies & Procedures
- › Statement of Principles
- › Code of Conduct
- › Data Protection Policy
- › Modern Slavery and Human Trafficking Statement

## Outcomes

Zero records of complaints/claims, tribunal or court cases or whistleblower reports on any employment issues or as a result of disciplinary measures.

Our Benchmarks Nos. 2, 3, 4, 5, 6 and 7 are met.



# Environment

## Principle 7:

Businesses should support a precautionary approach to environmental challenges.

## Principle 8:

Undertake initiatives to promote greater environmental responsibility.

## Principle 9:

Encourage the development and diffusion of environmentally friendly technologies.

### Robust commitments, policies and procedures for environmental stewardship

As a professional services company our direct impacts are limited. These, and any indirect impacts, are managed by a set of policies and procedures (see right). In keeping with our commitment to doing business responsibly and with integrity and our ambition for SDG 13 on Climate Action, our intention is to commit to a Net

Zero target early in 2021.

Key documents accessed via XIQ intranet site:

- › Human Resources Policies & Procedures
- › HSES Procedures Manual
- › Statement of Principles
- › Code of Conduct

### Effective management systems to integrate environment principles

Our environmental management system is underpinned by the HSE policy obligations in our Statement of Principles, and supported by risk, aspect and impact assessments and control procedures where needed. Our ISO 14001 certification confirms that environmental management arrangements are fit-of-purpose and properly maintained.

Our main, positive impact on the environmental principles and SDGs results from our design and engineering teams, which provide innovative solutions to meet or exceed client requirements, and our dedicated environmental teams, who work on diverse client assignments, ranging from Environmental and Social Impact Assessments and ESG due diligence to managing permits and facilitating policy development. In 2021, we are looking to maintain our organisational focus on navigating the Energy Transition and fostering the development of renewable energies, accelerating our efforts to improve penetration of the energy transition market and support the increasing uptake of offshore and onshore renewable energy services.

### Effective monitoring and evaluation mechanisms for environmental stewardship

Regular reviews are undertaken ensure that we monitor and maintain our ISO 14001 certification, adhere to all applicable environmental laws and regulations and that our internal standards remain compliant and aligned with good international industry practices.

## Outcomes

No environmental spills, incidents or legal non-compliances. COVID-19 has resulted in an atypical year and prevented us from taking meaningful measurements and setting suitable targets.

Our Benchmark No. 8 is only partially met.

# Anti-Corruption

## Principle 10:

Businesses should work against corruption in all its forms, including extortion and bribery.

### Robust Anti-Corruption policies and procedures

Bribery and corruption are generally considered as not major risks for Xodus but we are working with our main stakeholder to align with their approach on ethics and compliance. Our zero-tolerance approach to corruption is clearly defined in our Statement of Principles and new Code of Conduct, which prohibit all forms of bribery and corruption, including facilitation payments and inappropriate gifts or hospitality, in our commercial dealings, business relationships,

and contacts with government authorities and public officials. We expect our vendors to adopt a similar zero-tolerance approach to corruption, and undertake robust due diligence as appropriate.

Key documents accessed via XIQ intranet site:

- › Human Resources Policies & Procedures
- › Statement of Principles
- › Code of Conduct
- › Approvals Matrix

### Effective management systems to integrate the anti-corruption principle

All employees undergo mandatory compliance training in support of our anti-bribery and corruption objectives. Additional training may be provided for specific roles, potential business contacts and/or arising from working in countries with inadequate anti-corruption governance and policies.

Our Approvals Matrix establishes a defined and transparent level of accountability and authority for our operations. In the anti-corruption context, it sets out threshold criteria that require validation by a top management authority and prior, legal approval from our Contracts team of all commercial arrangements, including potential offers of any gifts or entertainment outside established limits to clients or public officials, or hiring any agent or third party to represent Xodus with public officials. We require our employees, associates and subconsultants to accurately record expenses related to any dealings with public officials and commercial parties.

### Effective monitoring and evaluation of anti-corruption integration

Potential violations of our compliance requirements will be investigated and may result in action, including possible criminal charges. Our people are encouraged to raise concerns with management initially or resort to our whistleblower system.

## Outcomes

No allegations, claims or reports of any breaches of our anti-corruption policies or rules.

Our Benchmark No. 9 is met.

# UN Sustainable Development Goals

Our primary contribution to the SDGs is through our core business activities.

Our core business activities increasingly align with the Energy Transition, supporting the development of clean energies, sustainable infrastructure, responsible energy production and urgent decarbonisation through innovation, digitalisation, energy efficiency improvements and specific focus areas like methane emissions reduction.

Direct and indirect employment, attractive salaries and terms and conditions, and government taxes

are examples of how we create economic and social benefits.

Xodus also brings indirect benefits, such as sharing technical expertise through its STEM outreach and capacity building, which is particularly important in developing or transitional economies like Myanmar where we have provided training in international impact assessment for the offshore energy industry to local practitioners.

**SUSTAINABLE  
DEVELOPMENT GOALS**

# Gender Equality

Addressing gender equality and women's empowerment is a core component of our Diversity and Inclusion commitments.

## In Summary:

- › Diversity and Inclusion initiative
- › STEM Outreach
- › Gender Pay Gap action planning

## 2025 Ambitions



We will have a 50/50 Female/Male Graduate intake across all Divisions



Women will make up at least 30% of our business at all levels



We will halve our Gender Pay Gap



We will appoint a Director of a BAME identity to the Leadership Team



We will make it possible for Project Managers to work part time

## 5 GENDER EQUALITY



Approximately one third of our workforce is female. In 2020, we undertook an analysis of the current situation, including a gender pay gap study and draft action plan, to improve our understanding and identify a range of potential actions to remedy the imbalances. A report on our gender gap will be published in Q1 2021.

In terms of continuing actions, the Leadership Team has appointed a Diversity and Inclusion Transformation Manager and will articulate a Diversity and Inclusion Statement followed by an action plan. An employee resource group will be established to enable its delivery across the globe. This initiative will be underpinned by an education program starting with the Leadership & HR teams, with the intent of cascading change throughout the global business. KPIs will be set to measure and report progress.



# Affordable and Clean Energy

## 7 AFFORDABLE AND CLEAN ENERGY



Our work in the global energy transition is providing impetus towards greater and quicker growth in cleaner, more efficient technologies and supporting infrastructure across the world.

The energy market has undergone significant change with investors starting to pull away from fossil fuel-only portfolios to focus on renewables and new energies. At the same time existing fossil fuel installations are looking at more energy-efficient operation, or sourcing electric power from renewable sources.

Since 2019 we have rapidly increased our capabilities in this area including the establishment of a renewables-focused division and the acquisition of businesses to provide global breadth and depth. This has facilitated cross-skilling of our teams who had previously focused largely on fossil fuel developments to allow them to apply their skills in a renewable energy or emissions abatement context.

We have also developed niche capabilities to facilitate quicker implementation of renewable projects by solving problems, addressing both financial and technical issues, and targeting early

### In Summary:

- › Renewables project development (e.g. offshore wind, green hydrogen)
- › Electrification studies
- › Modernising operational support
- › Input to Government policy
- › Development of energy optimisation tools
- › Supply chain building and enabling

involvement of capable local SME suppliers, which brings additional benefits to local communities.

### Examples of our work

Since its launch we have been working with developers to bid into the ScotWind leasing round; architecting the next generation of offshore wind projects

We were commissioned by a consortium of public and industrial partners to provide an initial assessment of Scotland's opportunity to produce green hydrogen from offshore wind. We also conducted a supply chain survey and developed a database of Scottish companies active in the green hydrogen sector, or with aspirations to become so.

Recently, we were awarded work on Australia's first large-scale green hydrogen plant, which is expected to produce 25 tonnes/day.

# Industry, Innovation and Infrastructure

## 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



Building of resilient infrastructure, the promotion of sustainable industrialisation and fostering innovation are core activities of our vision and values.

Since we were founded in 2005 we have had a technology component to our business alongside consultancy. This has allowed us to pioneer technologies and approaches to facilitate resilient, safe and efficient offshore infrastructure.

Creation of new energy projects is in part about delivering long-term safety, integrity and sustainability; and in part about maximising the potential of the existing built and natural environment. This includes everything from cable installation design, to the storage of carbon in depleted reservoirs, to the re-use or repurposing of ageing infrastructure.

In addition to providing robust solutions within engineering designs for new or improved energy assets and infrastructure, we have fostered innovative, remote digitalisation of client operations and process management. In support of this we have appointed a dedicated Innovation Manager.

### In Summary:

- › Innovation in remote digital operations (our XAMIN platform for asset management, virtual flare metering, carbon nano tubes)
- › R&D into infrastructure re-use and repurposing, including CO<sub>2</sub> storage
- › Intelligent data management including the expansion of our geospatial team
- › Skills transfer between oil and gas and renewables

### Examples of our work

Carbon capture, transport and storage projects in Europe including examining the techno-commercial feasibility of new proposals and evaluating the risk overlaps with the offshore wind sector.

XAMIN - the Xodus Asset Management and Integrity Network - is an asset management platform that collates data on performance, integrity and conditioning monitoring to inform and facilitate integrated asset integrity, safety, risk and environmental management while ensuring regulatory compliance.

Utilising decades' of offshore construction experience to design the inter-array cable installation concept for one of the first US offshore wind farms.

# Responsible Consumption and Production



Where fossil fuels continue to be exploited, we will continue to embed responsible strategies into new and existing projects.

Our traditional focus has been on ensuring responsible hydrocarbon management particularly in regards to the prevention of spills and accidental releases and their impacts on people, the environment and its ecosystems. We have a strong proficiency in spill modelling and contingency / response planning and can respond quickly to help with monitoring impacts, both virtually and in situ (e.g. costal site contamination and effects on marine life).

Our responsible approach to consumption and production incorporates:

- › Robust risk and impact assessment
- › Analysis of alternatives (including greenhouse gas and carbon lifecycle)
- › Input to project design including sustainable use of water resources
- › Recommendations for impact control mitigation

Finance is increasingly linked to the sustainability

## In Summary:

- › Creation of an energy efficiency team to enable sustainable production
- › Sustainable field development planning
- › Best Available Techniques assessments (e.g. responsible water use)
- › Environmental and Social Governance advisory services

profile of a project and our experience of helping projects meet World Bank / IFC standards means we are often in a position to help project proponents meet or exceed expectations and achieve a social license to operate.

During operations we help our clients prioritise their maintenance activities around both safety and environmentally critical elements, and we help them to optimise the energy efficiency of their assets.

We anticipate growth in Environmental and Social Governance advisory services, which are aimed at helping clients to understand their climate-related risks and what needs to be done about them in order to maintain inward investment from an increasingly carbon risk averse financial sector.

# Climate Action



We are morally obligated by our vision and values to support the energy industry in reducing its emissions to a net zero level as quickly as possible.

In addition to setting our own environmental performance targets, we are influencing and assisting our clients with their own ambitious carbon reduction campaigns. Our staff have wide experience in interpreting climate change scenarios, assessing carbon risks, GHG accounting, assurance and reporting.

We are also advising clients on effective decarbonisation and emissions abatement strategies and providing practical support through our specialist emissions team and integrated emissions and carbon (including embodied carbon) calculator tools.

Our 'Architecting the Energy Transition' offering brings a unique blend of technical skills, experience, innovative strength and commercial drive to create a pipeline of opportunities to contribute to ambitious climate actions in partnership with clients and other stakeholders with a wider geographical distribution.

## In Summary:

- › Architecting the energy transition
- › Creation of a climate risk and decarbonisation advisory service
- › Carbon capture advisory service
- › Creation of integrated emissions toolkits
- › Rising to the methane management challenge

## Examples of our work

- › Staff secondments to Oil and Gas UK for carbon and methane benchmarking
- › Energy transition consultancy assignments, challenging clients with poor emissions records and offering appropriate solutions
- › Energy efficiency and circular economy studies
- › Sharing innovation tools and techniques with clients
- › Exploring different energy export routes from the traditional grid
- › Using our Levelised Cost of Energy modelling tool to inform client decision-making
- › Developing new service offerings such as Methane Reduction Technical Support, which is focussing on reducing emissions, improving the accuracy of metering, assessment of new sensing and detection technology and the provision of practical assistance emissions in reduction campaigns.



# Life Below Water



The health of marine biodiversity and ecosystem services are fundamental to the future of the planet and its people.

Our environmental team has unrivalled experience in advising offshore clients on project site selection, marine survey campaigns, impact assessments and project development decision support to ensure that risks to habitats, endangered species and ecosystem services are fully understood and properly mitigated against.

We provide practical support in the articulation and implementation of biodiversity management and monitoring plans. Our services also extend to marine aquaculture and consideration of other users of the sea, notably the fishing sector and coastal communities that may be impacted by developments. Our eBase product, a cloud-based environmental impact identification and assessment platform, uses big data to streamline processes.

We also advise and train governmental and industry bodies on marine biodiversity and data handling.

## In Summary:

- › Pollution risk assessments
- › Decommissioning mapping and contribution to the INSITE programme
- › Training government and industry bodies on marine biodiversity
- › Site selection, survey campaigns and project development decision support

## Examples of our work

We conducted data-intensive pollution risk assessments for the UK Maritime and Coastguard Agency.

We participated in the INSITE Programme, a major collaboration between offshore industries and researchers, designed to give marine scientists access to valuable industry-acquired ecological data. In addition to providing a team of technology and industry experts, including GIS specialists and environmental researchers, we developed a novel web GIS tool “INSITE Interactive” which identifies the primary data collected by industry and facilitates access by researchers investigating the role of anthropogenic structures on marine infrastructures.

We have undertaken multiple advisory and research work scopes for UK and Australian marine organisations and will continue to advising and working with governments on marine biodiversity.

# Join Our Journey



## Experts with Energy

As a leading global energy consultancy, we help clients overcome challenges, add value to opportunities and maximise returns on investments, responsibly.

Our values of trust, responsibility and excellence underpin our vision. They are at the heart of decision making and inform our future strategy.

In offering expert advice and solving complex problems, our multi-skilled specialists work across the energy spectrum to address industry problems. By combining technology with our knowledge, we create better business outcomes whether it is advisory, project development or in operational support.

Together, we will deliver a responsible energy future - [www.xodusgroup.com](http://www.xodusgroup.com)

Headquartered in Aberdeen, Scotland with a global operations centre in London, Xodus has offices in the United Kingdom, United States, Australia, Egypt, Dubai, Abu Dhabi and Malaysia.

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