

Modern Slavery and Human Trafficking Statement for the Financial Year Ending 31 December 2023

Introduction

Sulmara is committed to conducting business in a manner that respects human rights and upholds the highest standards of ethical practice. Sulmara will never support or transact with any business knowingly involved in slavery or human trafficking.

Our Business

Established in 2019 and employing over 200 people worldwide, Sulmara is an international services provider specialising in site investigation, construction support, subsea survey, and inspection services across the offshore energy and utilities sectors. Our operations span multiple territories, and we work with a global network of suppliers and contractors in support of our efforts to deliver value for our customers and stakeholders.

Our Supply Chains

As a global organisation, Sulmara's supply chain includes local, national, and international suppliers and will include the procurement of a variety of goods and services related to subsea operations.

In acknowledging the potential risks of modern slavery and human trafficking, our partners and suppliers are made aware of our commitments to combat slavery and human trafficking and are expected to adhere to the same standards.

Policies and Commitments

We have a zero-tolerance approach to modern slavery, which is described in our Anti-Slavery Policy. In this policy, we outline our commitment to ethical business practices towards human rights, including the prohibition of forced labour, child labour, and human trafficking, among other things. All employees, suppliers, and contractors are required to comply with these standards.

Our Whistleblowing Policy encourages employees and other stakeholders to report any concerns related to modern slavery or unethical practices. Sulmara upholds a policy of non-retaliation and non-victimisation against any person who reports concerns about slavery and human trafficking.

Due Diligence Processes

As part of our backdrop of risk and competence-based screening, we have implemented the following due diligence processes to identify and mitigate the risks of modern slavery in our supply chain:

- **Risk Assessment:** We conduct regular risk assessments of our supply chain to identify areas where there is a higher risk of modern slavery. This assessment considers factors such as geographic location, sector, and the nature of the goods or services provided.
- **Supplier Selection and Onboarding:** As part of the onboarding process, all suppliers are required to confirm in writing that their operations and conduct conform with the requirements and standards set out in the Act and that they have adequate policies and procedures in place to ensure the same. As a condition of retaining approved status, suppliers are required to re-certify their compliance with the foregoing on a periodic basis or upon Sulmara's request.
- **Contractual Obligations:** Sulmara endeavours to include appropriate language in its contracts requiring suppliers to comply with the requirements and standards of the Act and to take steps to prevent modern slavery within their own supply chains.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the "Act") and sets out what Sulmara Subsea International Limited ("Sulmara") has in place to ensure that slavery and human trafficking are not taking place in its supply chain or in any part of its business.

Training and Awareness

Sulmara provides its employees with training on a range of compliance matters, including their obligations under the Act, and all employees within the Sulmara group of companies are expected to comply with all laws and act in accordance with appropriate guidelines and regulations. New employees receive training as part of the induction process to ensure that they understand the policies and procedures Sulmara has in place to ensure compliance with these regulations. Staff involved in the procurement process receive guidance on how to recognise the risks of modern slavery and human trafficking in our supply chain.

Monitoring and Review

We continuously monitor the effectiveness of our policies and procedures to combat modern slavery and all forms of unethical behaviour. In 2023, for example, we reviewed and updated our supplier onboarding protocols to ensure that they remain robust and effective.

Looking forward

We are committed to enhancing our efforts to tackle modern slavery in 2024 and beyond. Our focus areas for the year include:

- Increasingly the frequency and scope of our employee training programs;
- Monitoring legislative developments and updating our policies and procedures as required; and
- Assessing the viability of introducing a third-party managed web or phone-based whistleblowing service. Furthermore, this statement will be reviewed and updated annually.

Any changes, along with any developments relating to modern slavery and forced labour during the course of the year, will be set out in Sulmara's next modern slavery statement covering the financial year ending 31 December 2024.

Board Approval

This statement was approved by the Board of Directors of Sulmara Subsea International Limited on 5th September 2024 and is signed on its behalf by:

Kevin McBarron
Chief Executive Officer
5th September 2024