



ANNUAL SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This annual Slavery and Human Trafficking Statement provides information to supplement our Modern Slavery and Human Trafficking Policy (01-POL-11) in accordance with the Modern Slavery Act 2015. In this statement we set out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in our supply chains, or in any part of our own business. We include details of our activities, supply chains and the actions we have taken and are taking to ensure that modern slavery is not deliberately or inadvertently supported by us. The content of our modern slavery statement will evolve over time, to demonstrate a year-on-year improvement outlining practical progress on how we are tackling the risks and incidence of modern slavery in our operations and supply chains.

Statement of commitment

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. This policy applies to all persons who act on our behalf in any capacity, including employees at all levels: directors, consultants, contractors, agency workers, business partners and our supply chain.

We consider that modern slavery encompasses:

- human trafficking;
- forced work, through mental or physical threat;
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- being dehumanised, treated as a commodity or being bought or sold as property;
- being physically constrained or to have restrictions placed on freedom of movement.

Our Business Structure, Business and Supply Chain

Hughes Subsea Services Ltd (Hughes Subsea) works across multiple sites world-wide predominantly in UK / EU waters, conducting construction support operations and maintenance activities in the energy and subsea sectors. Hughes Subsea is based in Liverpool, Merseyside, United Kingdom, and the company activities are overseen by the Managing Director.

The main activities carried out by Hughes Subsea are offshore project support works utilising subsea intervention techniques such as surface supplied diving and Remotely Operated Vehicles (ROV). This work is predominantly seasonal and peaks during the spring and summer months due to better weather conditions, with autumn and winter being quieter periods for the Company.

Our supply chain mainly falls under the following categories:

- Labour;
- Sub-Contractors/Agency Staff;
- Suppliers of equipment and services;
- Suppliers of parts.



Document No: 01-POL-17

Title: Annual Slavery and Human Trafficking Statement

Revision A-01

Labour and suppliers are predominantly UK / EU based due to the specialist nature of the works undertaken by Hughes Subsea. Hughes Subsea strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation within the country in which the employee is situated and, in many cases, exceeds those minimums in relation to its employees.

Hughes Subsea considers its risk of exposure to slavery and human trafficking to be low; supply chains are generally based in countries with a low risk of slavery and human trafficking. Where a supply chain partner is identified within a country with a higher risk of slavery and human trafficking, or associated with one, appropriate verification measures shall be implemented.

Policies and Responsibility

The following policies and procedures help us to identify and prevent modern slavery in our organisation:

1. 01-POL-08 Whistle-Blowing Policy (Disclosure) Statement
2. 01-POL-11 Modern Slavery and Human Trafficking Policy
3. 01-POL-12 Equal Opportunities Policy Statement
4. 06-PRC-01 Supply Chain Assurance Procedure

The following senior manager has responsibility for the enforcement of our policies:

1. Mike Bailey – Managing Director

Due Diligence

Our business undertakes a range of activities to ensure that there is no slavery and human trafficking in the business and supply chain.

Our procurement process requires all suppliers and contractors to comply with the Modern Slavery Act 2015. To this effect we have an onboarding process for setting up new suppliers. During this we review their approach to modern slavery within their own supply chains, ensuring that as a minimum they meet the standards we set ourselves. Where no such policy exists, the proposed supplier needs to confirm they will adopt our standards. Once approved suppliers are reassessed based on their risk profile to ensure standards are maintained.

We have a written Whistleblowing Policy to empower staff to raise suspicions of unlawful and/or unethical employment practices. Placing a duty on staff to report any suspected criminal activity taking place within either Hughes Subsea or its suppliers. This policy is reviewed on an annual basis to ensure it remains valid and to monitor its effectiveness.

Evaluating Effectiveness

We appreciate the importance of constantly evaluating the effectiveness of our actions to eliminate slavery and / or human trafficking. Key performance indicators to measure the effectiveness of our Modern Slavery and Human Trafficking Policy are due to be developed within the next review cycle. Factors to be considered will include:

- Potential changes to be made to supply chain verification;
- The completion of staff training on modern slavery and trafficking;



Document No: 01-POL-17

Title: Annual Slavery and Human Trafficking Statement

Revision A-01

- The re-evaluation of supply chain partners and the monitoring of industry news to highlight high risk routes.

Training and Raising Awareness of Modern Slavery and Human Trafficking Issues

The following training has been provided within our business to staff this year:

- All employees who work with our external supply chain partners or have a role in requesting new partners have received training on the new process. This training has included an overview of our efforts to ensure modern slavery is not a part of our supply chain.
- All senior management and those who work within or have functions supporting procurement have been provided with the UK government's modern slavery awareness booklet.
(<https://www.gov.uk/government/publications/modern-slavery-awareness-booklet>)

Our emphasis this year is to source training which will provide structured learning appropriate to an individual's roles within Hughes Subsea.

Signed

Managing Director

Mike Bailey

Date: 20/08/2024