

## Annual Slavery and Human Trafficking Statement

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This statement shall be considered the Annual Modern Slavery and Human Trafficking Statement of Enshore Subsea Limited for the financial year, 01<sup>st</sup> January to 31<sup>st</sup> December 2023 and in accordance with Section 54 of the Modern Slavery Act 2015. This statement has been approved by the Enshore Subsea Senior Management Team on 20.02.2024 and endorsed by the Managing Director.

### Company Statement for Financial Year

Enshore Subsea shall not engage or do business with any organisation knowingly involved in slavery or human trafficking. Enshore Subsea are not aware of any evidence of modern slavery within its business and operations which comprises of slavery, servitude, forced and compulsory labour and human trafficking.

Enshore Subsea have taken the below steps during the financial year to prevent modern slavery risks in their supply chain and its own business.

### Company Structure

Enshore is organised by the implementation of a Senior Management Team and departmental structure consisting of Director, Head of Department and/or Management functions which lead and report to the respective Senior Management Team member. The Company Organisation Chart is maintained by the Human Resources department.

### Company Management System

The Enshore Management System shall be available to access by all employees. The Company policies, procedures, forms and associated documents contained within the Management System define how Enshore operates and compliance to such shall be a mandatory requirement. In order to achieve this requirement, Directors, Managers and Supervisory personnel shall be responsible for ensuring that all personnel under their jurisdiction shall understand and comply with Company processes and procedures relevant to their function(s).

### Company Supply Chains

Enshore Subsea expect a similar commitment from their Sub-Contractors, Suppliers and other Interested Parties in their approach to prevent slavery or human trafficking.

Enshore Subsea Sub-Contractor's shall complete a Supplier On-Boarding Form whereby they sign-up to Enshore Subsea standard terms and conditions. Enshore Subsea standard terms and conditions state the Seller undertakes, warrants and represents that:

- Neither it nor any of its Officers, Employees, Agents or Sub-Contractors:
  - has committed an offence under the Modern Slavery Act 2015 (an "MSA Offence") or
  - has been notified that it is subject to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015 or
  - is aware of any circumstances within its supply chain that could give rise to an investigation relating to an alleged MSA Offence or prosecution under the Modern Slavery Act 2015
- It shall comply with the Modern Slavery Act 2015 and
- It shall notify Company immediately in writing if it becomes aware or has reason to believe that it, or any of its Officers, Employees, Agents or Sub-Contractors have breached or potentially breached any of the Seller's obligations
- The Seller shall take all reasonable steps necessary to ensure:
  - its Supply Chain complies with the Modern Slavery Act 2015 and
  - it has the right to audit the Supply Chain to ensure such compliance
- The Seller shall prepare and deliver to the Company no later than 28 February each year, an Annual Statement setting out the steps it has taken to ensure slavery and human trafficking is not taking place in any part of its business or in any of its Supply Chains
- Purchase Orders are placed referencing relevant Enshore Subsea terms and conditions. Where bespoke terms are applied, they shall be reviewed by the Contracts Manager to ensure they align with Enshore Subsea standard requirements
- Suppliers shall be assessed on an annual basis for audit requirements and key Suppliers shall be included in the Enshore Subsea Annual Audit Schedule. As part of Enshore Subsea standard audit questionnaire, Suppliers shall verify that their Suppliers / Sub-Contractors comply with the Modern Slavery Act 2015

### Company Policies in Relation to Slavery and Human Trafficking

In addition to the Enshore Subsea commitment, this is further enforced by further Company policies and procedures, consisting of:

- ENS-HR-POL-001 Equality Diversity and Inclusion Policy
- ENS-HR-POL-002 Anti-Harassment and Bullying Policy
- ENS-HSEQ-POL-006 Anti-Bribery and Corruption Policy

Additionally, Enshore Subsea have introduced the procedure: ENS-HR-PRO-010 Whistleblowing Arrangements which is designed to encourage staff to report suspected wrongdoing as soon as possible. In the knowledge that their concerns shall be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

### Company Awareness

Enshore Subsea shall publish this statement on the homepage of their Company website and it shall be accessible to all employees and interested parties.

### Company Objectives

To continually improve the Enshore Subsea processes to prevent slavery or human trafficking within the organisation and its supply chain, the below objectives shall be achieved for the end of the next financial year:

- Formal incorporation of modern slavery awareness and familiarisation within the Company Human Resources Induction
- Identification and integration of foreseeable modern slavery risks within the Company Risks and Opportunities Register by the Commercial Dept. for new projects
- Development and implementation of a Company Modern Slavery and Human Trafficking Policy by the Senior Management Team



**Pierre Boyde**  
Managing Director  
21.02.2024