

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Introduction

Hughes Subsea Services Limited (Hughes Subsea) works across both the public and private sector, providing a variety of services within the subsea diving industry offshore and inshore including Civil Engineering, Offshore Renewables, working at height or confined spaces, etc. Additionally, Hughes Subsea is a leading consultant for industries such as Offshore Oil & Gas, Offshore Renewables, Telecommunications, Power Generation and Marine Civil Engineering sectors. In doing so, we are committed to supporting the UK Government's Action Plan to implement the UN Guiding Principles on Business and Human Rights.

This Statement has been designed to satisfy the requirements of Part 6 of the Modern Slavery Act 2015. It serves to inform our employees, suppliers, other third-party partners and customers about Hughes Subsea and its stance on modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains. The information included in this statement refers to the Financial Year 2019-2020.

Although, as a business, HSSL currently turn over less than the threshold for businesses required to publish a statement under the Act; we believe that it is important to demonstrate our commitment to observing the risks inherent in our supply chains and the steps that we are taking to address them.

Organisation Structure

Hughes Subsea work across multiple sites world-wide, conducting construction, operations & maintenance activities in the energy and subsea sectors. Hughes Subsea is based in Liverpool, Merseyside, UK. The organisation is controlled by a Managing Director.

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

Definitions

The Organisation considers 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 of the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

Hughes Subsea acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Hughes Subsea understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Our supply chain mainly falls under the following categories:

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

Hughes Subsea does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found

to involve itself in slavery, servitude and forced or compulsory labour.

Hughes Subsea Services Ltd. is committed to ensuring that:

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining are respected;
3. Working conditions are safe and hygienic;
4. Child labour shall not be used;
5. As a minimum, Living Wages are paid;
6. Working hours are not excessive;
7. No discrimination is practised;
8. Regular employment is provided; and
9. No harsh or inhumane treatment is allowed.
10. No labour provided to Hughes Subsea in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking.

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.

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to Offshore Oil and Gas; Offshore Renewables; Telecommunications; Power Generation; Civil Engineering.

HSSL understands that the organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

Potential exposure

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 is identified within a country with a higher risk of slavery and human trafficking, appropriate verification measures shall be implemented.

In general, Hughes Subsea considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, we have taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Steps

Hughes Subsea carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Hughes Subsea has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Hughes Subsea takes the following steps to ensure that modern slavery is not taking place:

1. Regularly reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected to be, involved in modern slavery or human trafficking.
2. Conduct regular reviews of current measures in place to identify and assess the potential risks in our supply chains. This includes thorough checking of identification documents for self-contractors; ensuring that third parties that we work with are carrying out necessary checks with regards to their employees; etc.
3. Creating action plans to address risk to modern slavery.
4. Have adopted a 'zero-tolerance' policy towards modern slavery.
5. Ensure that our policies are communicated effectively with all employees, customers and third-party companies.
6. Review the relevant policies annually and monitor its effectiveness.
7. Produce an easily accessible, written policy on Whistleblowing to empower staff to raise suspicions of unlawful and / or unethical

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- employment practices. Placing a duty on staff to report any suspected criminal activity taking place within either HSSL or its suppliers.
8. Review the Whistleblowing policy annually and monitor its effectiveness.
 9. Provide a mechanism for people outside of HSSL to raise suspicions of unlawful and / or unethical employment practices.
 10. Ensure that staff involved in the procurement of services, recruitment and deployment of workers are aware of and receive training on the company's policies and stance on modern slavery and human trafficking.
 11. Ensure that undue cost and time pressures are not applied to any of our suppliers if this is likely to result in unethical treatment of workers.
 12. Ask our suppliers to explain the impact that low costs may have on their workers each time an abnormally low quote or tender is received.
 13. Carry out regular reviews on expenditure and undertake risk assessments on the findings to identify products and / or services where there is a risk of modern slavery and / or illegal or unethical employment practices within the UK and / or overseas.
 14. Ensure to thoroughly investigate any supplier identified as high risk by direct engagement with workers wherever possible.
 15. Work with suppliers to rectify any issues of illegal or unethical employment practice.

Key performance indicators

Hughes Subsea are currently developing key performance indicators to measure its effectiveness in ensuring that modern slavery is not taking place in the organisation or its supply chains.

Slavery Compliance Officer

Hughes Subsea does not currently have a Slavery Compliance Officer. Instead, all Directors of the business are primarily responsible for ensuring that this policy is implemented throughout the company and for monitoring its use and effectiveness both internally and externally. They are also responsible for investigating any allegations of modern slavery in the company's business or supply chains.

Breach of this statement

Any employee found to have breached this statement / policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

Hughes Subsea may terminate its commercial relationship with suppliers, contractors and other business partners if found to have breached this policy or to have been involved in modern slavery or human trafficking.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 and will be reviewed for each financial year.

Signed,

Ian Hughes
Managing Director
Date: 01/02/2022

