



Document No: 01-POL-11

Title: Modern Slavery and Human Trafficking Policy

Revision A-05

---

## **MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

### **Introduction**

Modern slavery and human trafficking are violations of fundamental human rights. They may take various forms, including slavery, bonded and forced labour, sex trafficking, child labour and domestic servitude. These criminal activities all deprive people of liberty to exploit them for personal or commercial gain.

Hughes Subsea Services Limited 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 and 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 United Nations Guiding Principles on Business and Human Rights. We are committed to ethical principles and require all employees to comply with the employment legislation and supply chain management legislation in the countries within which we operate.

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, volunteers, interns, business partners and our supply chain.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

### **Supply Chain Management**

We will not support or deal with any business which is known to be involved in slavery or human trafficking.

As part of our due diligence procedure, prior to approving a new supplier, we will review the controls which they undertake to eliminate modern slavery and human trafficking, particularly regarding goods imported from outside the UK and EU which are potentially more at risk of involving slavery and human trafficking.

### **Responsibility**

Our senior management have been briefed on this subject and take responsibility for implementing this policy.

Our line managers at all levels are responsible for ensuring that all those who report to them understand and comply with this policy.

Staff at all levels are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HSEQ Manager.

### **Compliance**

All staff must read, understand and comply with this policy.

All staff must avoid any breaches of this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff must avoid any activity that breaches this policy.

All staff must report to their manager at the earliest opportunity, if they suspect or believe there has been a breach of this policy, or that a breach may occur in the future.



Document No: 01-POL-11

Title: Modern Slavery and Human Trafficking Policy

Revision A-05

---

Staff are reminded that there are systems in place to encourage the reporting of concerns and to protect whistleblowers.

### **Communication**

We will provide training about the risks of modern slavery and human trafficking to maintain a high level of understanding of this issue in our workforce.

Our zero-tolerance approach to modern slavery will be clearly communicated to all suppliers, contractors and business partners when we commence a business relationship with them and reinforced in our subsequent communications with them.

Our Annual Slavery and Human Trafficking Statement will provide information to supplement this policy, setting out the steps we have taken during the financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains, and in any part of our own business. Our annual statement will include details of our activities, supply chains and actions being taken to ensure that Modern Slavery is not deliberately or inadvertently supported by us.

### **Breaches of Policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We will terminate relationships with suppliers, individuals or business partners working on our behalf if this policy is breached.

Signed

Managing Director

Mike Bailey

Date: 20/08/2024