

Safe, Caring, Collaborative, Innovative, Sustainable

Modern Slavery Act Transparency Statement

Introduction

This statement sets out North Star Holdco Limited ("North Star") actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1st January 2022 to 31st December 2022.

As part of the marine industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

North Star is the parent company for North Star Shipping (Aberdeen) Limited, Boston Putford Offshore Safety Limited, Crewing Services (Aberdeen) Limited, Southern Crewing Services Limited, North Star (Guernsey) Limited, and North Star (Guernsey) South Limited which owns and operates Emergency Response and Rescue Vessels and Platform Supply Vessels engaged in the UK offshore industry.

Our vessel owner/operator and HR services entities are UK based, with crew who are employed by the Guernsey based entities working in international waters once the vessel is on location, specifically in the United Kingdom Continental Shelf (UKCS), which is outside the 12-mile limit from the UK. Vessels work outside of land territory of any states/countries.

North Star recognises that Modern Slavery is not an issue confined to businesses based in higher risk jurisdictions and it recognises, in particular, the risks that arise from the use of migrant labour and global supply chains.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The HR department is responsible for developing Group Policies which cover a wide range of topics including areas which specifically address Modern Slavery.
- **Risk assessments:** The QHSE department is responsible for risk analysis, including Human Rights and Modern Slavery risks with specific expertise added by the Purchasing Department in these areas.
- **Investigations/due diligence:** The Purchasing Department is responsible for supplier due diligence before entering our supply chain.
- **Training:** The HR Department is responsible for training on all Company Policies, including those that specifically address Modern Slavery risk areas, and targeted Modern Slavery training for those involved in the supply chain and management.

Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- An Ethics and Corporate Criminal Offences Policy, focused on North Star's values of respect, trust and integrity which.

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- Specifically addresses Modern Slavery risk areas
- Includes a whistleblowing procedure where we encourage all our workers to report any concerns related to the business or the way in which the business is run. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can submit concerns to the dedicated email address.
- A Recruitment Policy which specifically addresses Modern Slavery risk areas.
- Due diligence questionnaires that assessed suppliers and third parties across a range of compliance criteria including questions on specific Modern Slavery risk areas.
- North Star's fleet (and the fleet of any agency that North Star used) maintained Maritime Labour Convention (MLC 2006) accreditation. The MLC 2006 sets out seafarers' rights and conditions of work, including in respect of wages and hours of employment.

Due Diligence

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments through our own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Using the TISC Database, where suppliers can be checked for their compliance in general, and modern slavery and human trafficking in particular.

Training

We require staff working in supply chain and management within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.

During 2023, we plan to expand training on modern slavery to all employees through a newly implemented learning management system.

Board approval

This statement was approved on 7th March 2023 by our directors, who review and update it annually.

Matthew Gordon

Chief Executive Officer

North Star HoldCo Limited