

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 chain. This statement relates to actions and activities during the financial year 1st January 2020 to 31st December 2020.

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

North Star 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.

This statement is made pursuant to s.54(1) of the Modern Slavery Act 2015. This has been approved by the board of directors of North Star.

Organisational Structure

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

Supply Chains

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.

Relevant Policies, Procedures and Accreditations

In the financial year ending 31st December 2020, North Star had the following policies, procedures and accreditations in place:

- An Ethics and Corporate Criminal Offences Policy (and also a Recruitment Policy) focused on North Star's values of respect, trust and integrity 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.

Further Improvements

North Star have reviewed where further development can take place, and as a result we are:

- Requiring the Purchasing Manager, Buyers and any employees with purchasing responsibility to have completed training on modern slavery by the end of 2021.
- Continue with a commitment to evaluate all new suppliers before approval is granted to enter our Supply Chain.

Conclusion

North Star will continue to review the effectiveness of the measures we have taken to further improve our policies, procedures and other measures in respect of Modern Slavery.

Matthew Gordon

Chief Executive Officer

North Star HoldCo Limited