

Subsea Technology and Rentals Limited and its subsidiary companies ("STR") will not support or deal with any business knowingly involved in slavery or human trafficking. This policy sets out the steps taken to ensure slavery and human trafficking is not present in our supply chains or any part of our business.

At STR we have a zero-tolerance approach to all forms of slavery and human trafficking within our business and supply chain. In line with the UK Modern Slavery Act 2015 and any other jurisdictional comparative regulations and acts, we've set out the steps we are taking to identify and minimise modern slavery risk.

No evidence of modern slavery or forced labour will take place in our operations or supply chain. STR and its' supply chain has a purpose to help the world's energy transition. We will conduct all reasonable endeavours to put measures in place to prevent bribery, corruption, and all forms of slavery.

We are committed to the prevention of slavery and human trafficking in our Ethics and Compliance policy. All employees within STR are required to read our Ethics and Compliance policy upon joining. Employees also receive training on Anti Bribery & Corruption as part of their annual training with STR and will do so on an ongoing basis.

Our Ethics and Compliance policy applies to all employees, directors and officers and emphasises everyone's responsibility to uphold the commitments of STR to ethics, safety, and compliance, and to ensure that any third parties engaged, such as consultants, agents, contractors and suppliers are also aware that they are expected to adhere to the same standards.

The key principles set out in our Ethics and Compliance policy include, amongst other things, responsibilities in the following important areas: Health, Safety; Security and Environment; Diversity; Confidentiality; Equal Opportunity and Remuneration; a Harassment-Free Workplace; Anti-Bribery and Corruption; Whistleblowing; and Human Rights. Each of these principles contributes to the reduction of risk associated with slavery and human trafficking.

In respect of Human Rights, our Ethics and Compliance policy states: "STR is committed to preventing human trafficking, forced labour, child labour and supporting freedom of association and the right to collective bargaining, whether in STR's business or any of its supply chain."

Under our Ethics & Compliance policy "Whistleblowing" employees and other parties connected to STR such as shareholders and contractors are encouraged to raise concerns regarding unsafe or unethical matters with the CEO or Group Human Resources Manager. We do not tolerate retaliation or victimisation against anyone who reports any concerns about possible violations of our Ethics and Compliance policy, including slavery and human trafficking.

Drafted by:



Jill Williamson - Group HR Manager

Approved by:



Steve Steele - STR Chief Executive Officer (CEO)