

MODERN SLAVERY STATEMENT



Preface

This statement pursuant to Section 54 of the Modern Slavery Act 2015 and approved by its board of Directors sets out Seajacks Group Companies (Seajacks International Ltd, Seajacks UK Ltd, Atlantis Equityco Ltd, Atlantis Investorco Ltd Atlantis Midco Ltd, Seajack 1 Ltd, Seajacks 2 Ltd, Seajacks 3 Ltd, Seajacks 4 Ltd, Seajacks 5 Ltd, Seajacks Crewing Services Ltd) 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 1 April 2019 to 31 March 2020.

As part of the Renewable Industry and the Oil and Gas Industry the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking. The company 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

This statement covers the activities of Seajacks. Seajacks operate self-propelled jack-up vessels which provide safe and efficient offshore solutions all over the world. We operate in both the Renewable and Hydrocarbon industries.

With our head office in Great Yarmouth, Seajacks has been expanding steadily since 2006.

Seajacks owns and operates five of the world's most advanced and capable harsh environment self-propelled jack-up vessels, Seajacks Kraken, Seajacks Leviathan, Seajacks Hydra, Seajacks Zaratan and Seajacks Scylla.

With an extensive track record Seajacks' vessels have proven that they provide an effective solution to the installation and maintenance of offshore wind turbines, foundations and substations. Likewise, in the offshore oil & gas sector, the vessels have brought a new dimension to maintenance; modification; construction and decommissioning of wells and platforms in the North Sea.

Countries of operation and supply

The organisation currently operates in the following countries United Kingdom, Netherlands Germany, Denmark, Northern Ireland, Norway and The United Arab Emirates.

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations, Whistleblowing policy, Employee Code of Conduct, Supplier/Procurement Code of Conduct, Recruitment / Agency Workers Policy.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- Mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Conducting supplier audits or assessments which have a greater degree of focus on slavery and human trafficking where general risks are identified.
- Creating an annual risk profile for each supplier.
- Participating in collaborative initiatives focused on human rights in general.
- Using details on database where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking. In our business, we have provided external and internal training to relevant members of staff onshore and crews on the vessels.

Performance indicators

We will use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Completion of audits including site visits and vendor assessment forms.
- Annual audits and collation of data of vendor assessment forms.
- Use of labour monitoring.
- Level of communication and personal contact with supply chain to ensure their understanding of, and compliance with, our expectations.

Approved by:

Blair Ainslie, CEO

Date:

Signature

27/3/19 W.B.B. Ainslie