

## Modern Slavery Policy

### 1. POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. This policy sets out Northern Divers' commitment to removing, wherever it exists, slavery or human trafficking in our business and supply chains\*.

Whilst we are not required to comply with The Modern Slavery Act 2015, we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery.

This policy applies to all persons working for us or on our behalf in any capacity, at all levels throughout the organisation and supply chain\*.

This policy does not form part on any employee's contract of employment, and we may amend it at any time.

Diligence and due care are taken to ensure that Northern Diver and our partners remain in compliance with:

- Adherence to local and national laws
- Freedom of workers to terminate employment.
- Freedom of movement
- Freedom of association
- Prohibition of threats of violence
- Prohibition of worker-paid recruitment fees
- Prohibition of compulsory overtime
- Prohibition of child labour
- Prohibition of discrimination
- Prohibition of the confiscation of workers original identification documents
- Access to remedy, compensation, and justice for victims of modern slavery

### 2. RESPONSIBILITY FOR THE POLICY

The Northern Diver (International) Ltd board has overall responsibility for ensuring that all the staff and supply chain\* comply with this policy.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

The Northern Diver supply chain\* (all suppliers & sub-suppliers) must make sure there are no cases of Modern Slavery taking place within their organisations.

### 3. COMPLIANCE WITH THE POLICY

The prevention, detection, and reporting of modern slavery in any part of the organisation is the responsibility of all staff. All staff are required to avoid any activity that might lead to or suggest a breach of this policy. Staff are provided with ongoing training around modern slavery to ensure they are aware of their rights and the warning signs to look out for when dealing with third parties. All staff must notify management as soon as possible of concerns about any issue of suspicion of modern slavery in any parts of the organisation.

If any member of staff is unsure about whether a particular act, the treatment of staff more generally, or their working conditions within the organisation constitutes any of the various forms of modern slavery, they should raise it with the management.