

VROON OFFSHORE UK LTD AND SUBSIDIARIES

2025 MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made on behalf of Vroon Offshore UK Ltd and its subsidiaries pursuant to Section 54(1) of the Modern Slavery Act 2015.

1 OPENING STATEMENT FROM SENIOR MANAGEMENT

- 1.1 Vroon Offshore UK Ltd ("Vroon") is committed to ensuring that modern slavery, in all its forms including slavery, servitude, forced and compulsory labour, child labour and human trafficking, does not take place in any part of its business or supply chains, or that of its subsidiaries.
- 1.2 Vroon's Board of Directors has overall responsibility for identifying, assessing and managing modern slavery risk and responding to suspected or alleged modern slavery on behalf of Vroon. They are supported by Vroon's Senior Management in ensuring that the Modern Slavery and Human Trafficking Policy is implemented effectively, and Vroon's Management in ensuring that their teams understand and comply with the Modern Slavery and Human Trafficking Policy.
- 1.3 Vroon takes a zero-tolerance approach to modern slavery and expects the same high standards from its contractors, suppliers, and other business partners.

2 STRUCTURE OF THE ORGANISATION, OUR BUSINESS AND SUPPLY CHAINS

- 2.1 Vroon provides offshore support vessel services and commercial, technical management and administration services, predominantly in the oil and gas sector. The principal service we provide is the provision of Emergency Response and Rescue Vessels in the North Sea, from Aberdeen, Lerwick, Great Yarmouth and Leith.
- 2.2 Vroon is the parent company of the below UK subsidiaries. This statement is a joint statement for the following entities:
 - 2.2.1 Vroon Offshore Services Limited
 - 2.2.2 VOH Support Vessels Limited
 - 2.2.3 Deeside Crewing Services Limited
 - 2.2.4 Nomis Offshore Limited
 - 2.2.5 Offshore Support Vessels IV Limited
 - 2.2.6 Offshore Support Vessels V Limited
 - 2.2.7 Offshore Support Vessels VI Limited
 - 2.2.8 Offshore Support Vessels VII Limited

2.2.9 Offshore Support Vessels IX Limited

- 2.3 As at 31 December 2025, Vroon has a global annual turnover of over £36 million and is producing this statement as required under the Modern Slavery Act 2015, and due to our commitment to preventing modern slavery in our business operations. To find out more about the nature of our business, please visit our website at <https://www.uk.vroonoffshore.com/>
- 2.4 In order to provide offshore support activities, and commercial, technical, management and administration services, we work with a range of suppliers, who are predominantly UK based and long-term partners of Vroon. They provide engineering and fabrication services, food and consumables, safety services, waste services, logistics, equipment, and machinery. Suppliers are required to agree to Vroon's General Purchase Conditions which include warranties on labour conditions, and the prohibition of slavery, child labour, and human trafficking. Vroon currently has visibility over our direct suppliers, but will look to map beyond tier one in future years.
- 2.5 As at 31 December 2025, Vroon's labour supply chain includes direct employment of approximately 40 staff, and approximately 850 permanent crew and 50 temporary crew provided by a staffing company, and the support of a small number of agency staff. We use reputable recruitment agencies to support our crewing services, and all agencies used are Maritime Labour Convention certified.
- 2.6 In order to produce this statement we have sought information from internal stakeholders across the company, and have completed an initial risk assessment questionnaire developed by our external legal advisors.
- 2.7 Since our last statement, we have carried out a more detailed analysis of our suppliers and labour supply chains and considered these to identify any areas of increased risk, and we intend to increase our vendor audits in 2026 to further understand any modern slavery risks they present.

3 POLICIES

- 3.1 As part of our commitment to combating modern slavery and human trafficking, we have implemented the following policies, procedures, and agreements:
- 3.1.1 Modern Slavery and Human Trafficking Policy,
 - 3.1.2 Disciplinary Policy,
 - 3.1.3 Code of Conduct,
 - 3.1.4 Whistleblowing Policy,
 - 3.1.5 Crew Complaint Procedure,

- 3.1.6 Code of Conduct for the Merchant Navy,
 - 3.1.7 Work and Rest Hour Policy,
 - 3.1.8 Vroon 5 Golden Rules,
 - 3.1.9 Crew Recruitment Promotion and Training Standards,
 - 3.1.10 Sexual Harassment Policy,
 - 3.1.11 Young Persons Policy,
 - 3.1.12 Seafarers Employment Agreement.
- 3.2 Many of Vroon's policies originate from Vroon Holding B.V., who support Vroon in our implementation of the policies, including through conducting auditing within the European Union on Vroon's behalf. These policies are regularly reviewed and will be revised where necessary.
- 3.3 In producing our policies, we have considered our responsibilities under the Maritime Labour Convention 2006, in particular Article IV:
- 1. Every seafarer has the right to a safe and secure workplace that complies with safety standards.
 - 2. Every seafarer has a right to fair terms of employment.
 - 3. Every seafarer has a right to decent working and living conditions on board ship.
 - 4. Every seafarer has a right to health protection, medical care, welfare measures and other forms of social protection.
 - 5. Each Member shall ensure, within the limits of its jurisdiction, that the seafarers' employment and social rights set out in the preceding paragraphs of this Article are fully implemented in accordance with the requirements of this Convention. Unless specified otherwise in the Convention, such implementation may be achieved through national laws or regulations, through applicable collective bargaining agreements or through other measures or in practice.
- 3.4 Vroon is a member of the UK Chamber of Shipping and the Maritime Anti-Corruption Network, and we have engaged with relevant stakeholders by attending crewing seminars to seek and receive updates on relevant changes and best practice on crewing arrangements, including changes to the Maritime Labour Convention rules. These have been considered when developing the policies and procedures detailed

above, and we engage with Nautilus Union at least annually to discuss pay review, and any proposed changes to Seafarer Employment Agreement Terms and Conditions.

- 3.5 We ensure our people are aware of our policies by providing copies via our central document management system, and that our suppliers/subcontractors adhere to the same high standards by agreeing to terms and conditions relating to labour conditions, slavery, child labour and human trafficking as part of our general purchase conditions. A copy of these terms and conditions is also made available on the Vroom Holding B.V. website.
- 3.6 We have sought and received confirmation from a sample of our existing suppliers that they have relevant modern slavery policies and procedures in place. We are currently carrying out more detailed audits of the suppliers used by Vroom.
- 3.7 Since our last statement, we have introduced a standalone modern slavery and human trafficking policy, and updated our disciplinary policy to expressly indicate that a breach of the modern slavery and human trafficking policy would constitute gross misconduct. Going forward, we intend to review these policies in 2027 to identify whether any further actions are required, including where identified through audit, or in the case of changes to our areas of operations.

4 **DUE DILIGENCE**

- 4.1 As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have implemented due diligence procedures designed to:
 - 4.1.1 identify and assess areas of potential risk in our business and supply chains;
 - 4.1.2 monitor potential risk areas in our business and supply chains;
 - 4.1.3 engage with workers and suppliers;
 - 4.1.4 prevent and mitigate the risk of slavery and human trafficking occurring in our business and supply chains; and
 - 4.1.5 provide adequate grievance mechanisms and protection for whistleblowers.
- 4.2 This includes supplier audits or self-assessments which were updated in 2025 to include specific questions on modern slavery arrangements, and the inclusion of contractual obligations to require our suppliers to comply with anti-slavery laws.
- 4.3 We have put in place grievance and other reporting mechanisms for workers in our organisation, our subcontractors and our supply chain. Any of these persons can report to:

- 4.3.1 their line manager,
- 4.3.2 Vroon's HR Department,
- 4.3.3 Vroon's Business Ethics Committee,
- 4.3.4 whistleblower@vroon.nl
- 4.4 Reports can be made confidentially and without fear of retaliation. We have a Whistleblowing Policy in place which includes protection against retaliation, and provisions for investigation of whistleblowing reports.
- 4.5 No circumstances have arisen to date where modern slavery has been identified. Should such circumstances arise in future, Vroon would assess and consider appropriate remediation on a case-by-case basis.
- 4.6 As part of our due diligence, we have considered our own business model and key performance indicators (KPIs) to determine whether they risk causing, contributing or resulting directly in modern slavery, and have not identified any KPIs which we consider would have this effect.
- 4.7 As part of our stakeholder engagement, we have participated in annual discussions with Nautilus Union on seafarer engagement, and we have participated in UK Chamber of Shipping and Maritime Anti-Corruption Network events to understand relevant sectoral risks and best practice, which inform our approach to due diligence.
- 4.8 Since our last statement, we have formalised our supplier audit process and we intend to conduct an increasing number of supplier audits in 2026 and beyond.

5 RISK MANAGEMENT

- 5.1 Vroon has evaluated the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain, and will review this on an annual basis, or sooner where required by changes in Vroon's risk profile. The Vroon Dedicated Person Ashore is responsible for our modern slavery risk assessments, supported by Vroon Group Legal Counsel.
- 5.2 Vroon carried out initial data collection for a formal risk assessment from November 2024 to February 2025, and this information forms the basis of this statement. Vroon has compiled details of Vroon's activities within a risk assessment questionnaire provided by its external legal advisors, incorporating information from across the business, on the company, how business is conducted, recruitment, communication, audit and monitoring, reporting and whistleblowing mechanisms, and details of Vroon's historical compliance on modern slavery issues. This has been gathered from internal data holders, and Vroon's existing policies and procedures.

- 5.3 We do not consider that we operate in high-risk sectors or locations because we predominantly carry out activities within the UK, working with reputable organisations, and ensuring recruitment activities are Maritime Labour Convention compliant.
- 5.4 Of the risks which we are exposed to, we are aware that our highest risk area is ensuring the welfare of our seafarers. We have implemented relevant measures to reduce and prevent this risk, including ensuring that workers have free access to identity documents, ensuring that they are paid above the UK national minimum wage, that payment of wages is only approved to the named employee's bank accounts, that no deductions or currency conversion costs are paid by the employee, that all vessels are manned above minimum manning levels, that all seafarers have time on shore, and vessels have welfare and recreational facilities and facilities to allow for crew contact with friends and family.
- 5.5 We engage with Nautilus Union, the UK Chamber of Shipping, and the Maritime Anti-Corruption Network to understand, identify, and prioritise risks facing our sector, and our seafarers.
- 5.6 Since our last statement, we have carried out the initial data collection to support a formal risk assessment, and we have considered and identified the highest priority risks arising from this. Going forward, we plan to produce a formal risk assessment and ensure that this is subject to regular review.

6 **EFFECTIVENESS AND KPIS**

- 6.1 Vroon is committed to making year-on-year progress in identifying, preventing and responding to modern slavery. We will continue to maintain a zero-tolerance approach to modern slavery within our operations.
- 6.2 We use key performance indicators (KPIs) to measure how effective our progress towards our goals has been. These are as follows:
- 6.2.1 Employee Retention Rate
- 6.2.2 Training Participation
- 6.3 Vroon's Dedicated Person Ashore is responsible for setting and monitoring our goals and KPIs.
- 6.4 In order to monitor and assess the effectiveness of our progress, we use the following sources of information: flag state and Maritime Labour Convention audits, internal audits, whistleblowing reports. None have identified any adverse findings in respect of modern slavery or crew welfare.
- 6.5 As the outcomes from our monitoring and evaluation have not identified any adverse findings, no changes to our business practices have been made following these.

However, we will continue to keep findings under review and make future updates as required.

- 6.6 We engage with those conducting flag state or maritime labour convention audits to understand the effectiveness of our measures to protect seafarer welfare, and we will build on this in 2026 and beyond to ensure the effectiveness of our monitoring and evaluation of suppliers.
- 6.7 Since our last statement, we have carried out an increasing number of supplier audits. Going forward, we will increase the robustness of these audits, and carry them out on a wider range of suppliers.

7 **TRAINING**

- 7.1 We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees learn the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains. They are also encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy.
- 7.2 Our training programmes are developed and delivered by CPD Store Online (for onshore personnel) and Mintra (for offshore personnel).
- 7.3 The training covers how to define modern slavery, identify the signs of modern slavery, and how to report suspected modern slavery. In 2025, 67% of our onshore personnel, and over 55% of our offshore personnel completed the training, with the remaining staff members due to complete their training in 2026. The training includes an assessment to confirm recipients' understanding, and all staff who completed the assessment in 2025 passed the training.
- 7.4 Since our last statement, the above training was rolled out to onshore and offshore personnel. We plan to ensure 100% completion in 2026, and will consider whether further role-specific training is required.

Stuart G Thom
Director