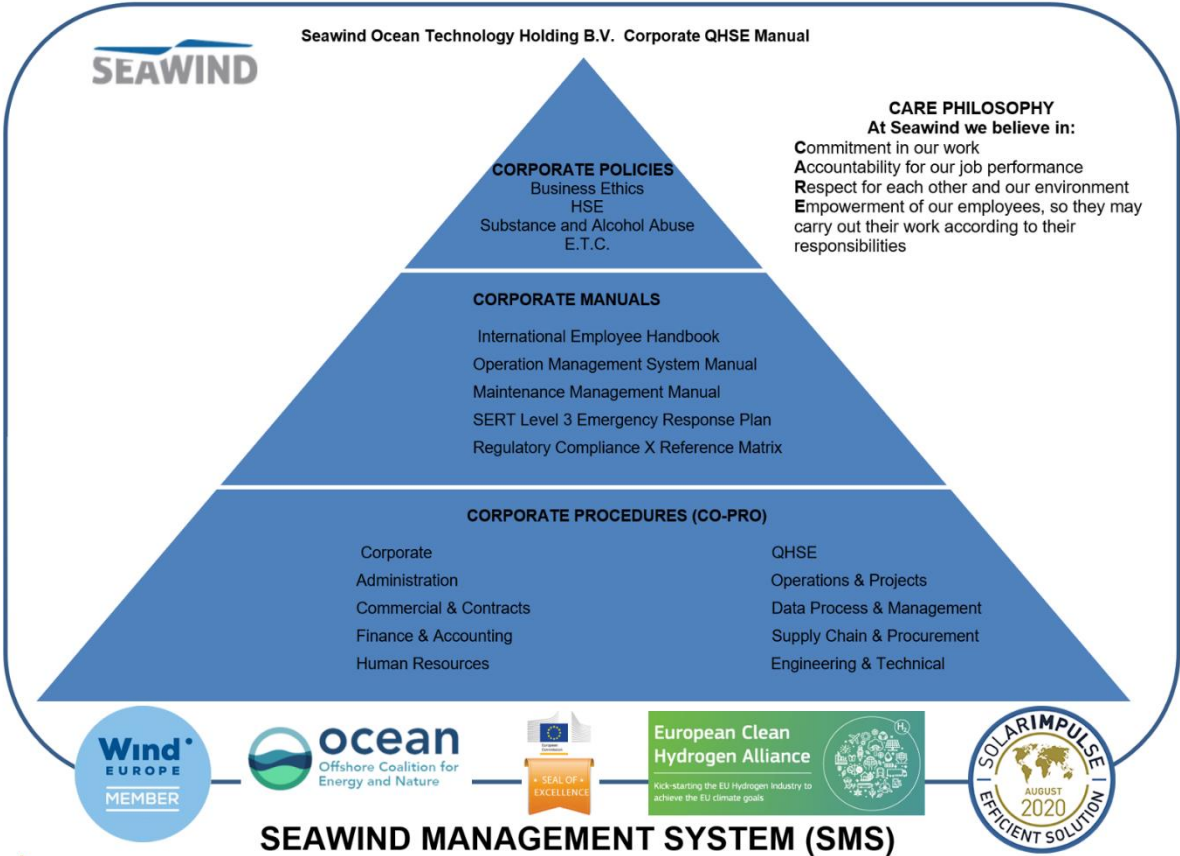


Policy No: **CO-POL-103**

Policy Title: **MODERN SLAVERY POLICY**





1. Introduction

This statement is made pursuant to of the Modern Slavery Acts in UK and EU (2015 onwards) and sets out the steps that Seawind has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery is a crime and a violation of an individual's human rights. Modern Slavery can take various forms such as slavery, servitude, human trafficking and forced and compulsory labor.

Seawind has a zero-tolerance approach to any form of modern slavery.

Seawind is committed to acting ethically and with integrity and transparency in all of our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

2. Valid for

This policy is applicable for Seawind Ocean Technology Holding B.V. and all its subsidiaries and affiliates.

3. Purpose

Seawind operate under a number of internal policies and procedures to ensure that we are conducting business in an ethical and transparent manner.

These include:

1. Equal Opportunities & Diversity Policy. This policy sets out Seawind's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment Procedure. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing Procedure. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Ethical Trading Procedure. This code explains the manner in which we behave as an organization and how we expect our employees and suppliers to act.

3.1 Supply Chain

Seawind operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organization has never been convicted of offenses relating to modern slavery [and on site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For EU based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light]

3.2 Training

We will regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

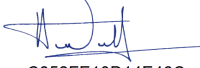
3.3 Performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:



- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Vincent Dewulf

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Chair of the Board

Seawind Ocean Technology Holding B.V