

## Modern Slavery Act Transparency Statement

### Introduction

This statement sets out North Star Holdco Limited (“North Star”) 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<sup>st</sup> January 2025 to 31<sup>st</sup> December 2025.

As part of the marine industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

Our organisation 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

North Star is the parent company for North Star Shipping (Aberdeen) Limited, North Star South Limited, Crewing Services (Aberdeen) Limited, Southern Crewing Services Limited, North Star DB Holdings Limited, North Star Midco Limited, Grampian Tyne Limited, Grampian Tweed Limited, Grampian Tees Limited and Grampian Derwent Limited which owns and operates Emergency Response and Rescue Vessels, Platform Supply Vessels and Service Operations Vessels, engaged in the UK offshore industry in the North Sea.

We do not consider any of our activities to be of high risk of slavery or human trafficking. However, North Star recognises that Modern Slavery is not an issue confined to businesses based in higher risk jurisdictions and it recognises, in particular, the risks that arise from the use of migrant labour and global supply chains.

### Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- **Policies:** The HR department, with support from the Legal department, is responsible for developing Group Policies which cover a wide range of topics including areas which specifically address Modern Slavery.
- **Risk assessments:** The Legal department is responsible for risk analysis, including Human Rights and Modern Slavery risks.
- **Investigations/due diligence:** The Purchasing Department, with support from the Legal department, is responsible for supplier due diligence before entering our supply chain.
- **Training:** The HR Department, with support from the Legal department, is responsible for training on all Company Policies, including those that specifically address Modern Slavery risk areas, and targeted Modern Slavery training for those involved in the supply chain and management.

### Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- An Ethics and Corporate Criminal Offences Policy, focused on North Star’s values of respect, trust and integrity which.

- Specifically addresses Modern Slavery risk areas
- Includes a whistleblowing procedure where we encourage all our workers to report any concerns related to the **business or the way in which the business is run**. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns can submit concerns anonymously to a dedicated email address.
- A Recruitment Policy which specifically addresses Modern Slavery risk areas.
- Due diligence questionnaires that assess suppliers and third parties across a range of compliance criteria including questions on specific Modern Slavery risk areas.
- North Star's fleet (and the fleet of any agency that North Star used) maintains Maritime Labour Convention (MLC 2006) accreditation. The MLC 2006 sets out seafarers' rights and conditions of work, including in respect of wages and hours of employment.

### **Due Diligence**

We undertake due diligence when considering taking on new suppliers, and regularly review existing suppliers. Our due diligence and reviews include:

- Evaluating the modern slavery and human trafficking risks of our key suppliers
- Conducting supplier audits or assessments through our own staff.

### **Performance Indicators**

We have reviewed our key performance indicators (KPIs). As a result, we have;

- Required all staff to have completed (refresher) training on modern slavery by 30<sup>th</sup> June 2025.
- Developed a system for supply chain verification, which is in place and during 2025, 100% of key suppliers were evaluated.
- Review of existing supply chains, achieved 4 supplier audits in 2025.

### **Training**

We require all staff within our organisation to complete annual training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority and "Stronger together" initiative.

During 2025, we plan to implement further training on Identifying Modern Slavery in the Supply Chain through our learning management system.

**Board approval**

This statement was approved on 7th May 2026 by our directors, who review and update it annually.



Gitte Gard Talmo

Chief Executive Officer

North Star Holdco Limited