



Modern Slavery Statement Year Ending 31 Dec 2025

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Table of Contents

1.0 Context-----2

2.0 Our business and supply chains-----2

3.0 Policies in relation to slavery and human trafficking-----3

4.0 Due diligence processes-----4

5.0 Risk assessment and management -----4

6.0 Measuring effectiveness -----4

7.0 Training and awareness-----5

1.0 Context

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken during the financial year ending 2025 to prevent modern slavery, forced labour and human trafficking within our business and supply chains.

We are committed to acting ethically and with integrity in all business relationships and to implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our own operations or in our supply chain.

Although this statement is made on behalf of the UK entities listed at the end of this document, these entities operate within a wider group framework, and this statement reflects an approach to managing modern slavery risks across the organisation.

2.0 Our business and supply chains

Acteon is a global provider of subsea engineering, equipment and data-driven services that support the design, installation, operation, maintenance and decommissioning of offshore energy infrastructure across its full lifecycle.

During the financial year 2025, Acteon delivered these services through five business lines:

- 1. Mooring and anchors
- 2. Marine Foundations
- 3. Geo-services
- 4. Engineering
- 5. Energy services

Our services are typically delivered through project-based operations involving offshore vessels, specialist equipment and highly skilled personnel operating across multiple jurisdictions. These activities often require coordination with a wide range of contractors, service providers and business partners.

Our supply chains are global and diverse, and include:



- manufacturers and suppliers of specialist engineering equipment and components
- vessel owners and offshore service providers
- freight forwarders and logistics providers supporting domestic and international transport
- labour providers, subcontractors and personnel agencies
- port services and crew-change support providers
- professional and technical service providers

Certain parts of our supply chain involve activities that are recognised as higher inherent risk from a modern slavery perspective, particularly where low-skilled or subcontracted labour may be used, or where services are delivered in higher-risk jurisdictions.

While each business line manages their supply chains locally, they do so within a consistent groupwide compliance framework. This includes the application of common policies and due diligence requirements to promote a coordinated approach to identifying and mitigating modern slavery risks across all business lines and geographies. Suppliers are onboarded through formal processes and are subject to ongoing monitoring, including compliance screening, contractual requirements and, where appropriate, supplier audits.

3.0 Policies in relation to slavery and human trafficking

We operate under groupwide policies designed to ensure ethical business conduct, including our:

- **Antislavery and Human Trafficking Policy** which sets out our zero-tolerance approach to slavery and human trafficking by defining responsibilities, providing guidance, helping identify and prevent risks in our business and supply chains, and explaining how to report concerns.
- **Third Party Screening Policy** introduced in Q1 2025 which sets out minimum requirements for screening third parties to identify and manage legal, ethical and reputational risks.
- **[Supplier Code of Conduct](#)** setting minimum standards for suppliers
- **I-CARE Code** which is our code of conduct introduced in Q1 2025, setting core values and expected behaviours, guiding employees to make decisions and act ethically, legally and responsibly in line with Integrity, Compliance, Accountability, Respect and Ethics.

These policies prohibit slavery, forced labour and human trafficking and require compliance with applicable laws and international human rights standards.

Suppliers are required to acknowledge and comply with these standards by acknowledging, signing or contractually committing to our Supplier Code of Conduct.

These policies encourage the reporting of breaches or concerns. Acteon upholds a policy of non-retaliation or victimisation against anyone who reports concerns about slavery and human trafficking. Staff can report concerns in various ways including to line managers, the I-CARE team (formerly the compliance team) or via Acteon's third-party operated compliance helpline and confidential web reporting system (which includes an option to report anonymously). This reporting system is also available to external reporters who are encouraged to report concerns via our Supplier Code of Conduct.



4.0 Due diligence processes

We undertake due diligence in relation to modern slavery risks across our supply chains, including:

- Supplier onboarding questionnaires requiring confirmation that slavery and forced labour are not used
- Requests for suppliers' policies and supporting documentation
- Supplier prequalification processes and approval procedures
- Screening of suppliers using compliance screening tools
- Ongoing monitoring through audits and supplier assessments based on risk and scope of services
- Enhanced processes for logistics partners or high risk business partners

Where appropriate, suppliers are required to provide copies of relevant policies and demonstrate their own due diligence processes.

5.0 Risk assessment and management

We assess modern slavery risks within both our operations and supply chain through:

- Use of external indices (e.g. Global Slavery Index, Corruption Perceptions Index) to assess geographic risk
- Consideration of sector, service type and supplier category
- Integration of modern slavery risks into risk registers

Identification of higher-risk activities such as:

- labour supply and agency workers
- freight forwarding and logistics
- vessel and port-related services
- crew-change and subcontracted labour

Certain jurisdictions (e.g. parts of the Middle East) and activities involving low-skilled labour or subcontracted services are recognised as higher risk and subject to enhanced due diligence.

6.0 Measuring effectiveness

We monitor the effectiveness of our controls through:

- Supplier audits and assessment programmes
- Compliance screening of suppliers
- Ongoing supplier performance monitoring
- Updates to procurement procedures and supplier management systems
- Integration of ESG risk indicators into supplier databases



During financial year 2025, improvements included enhanced supplier questionnaires, digital onboarding processes, and expanded supplier risk visibility through system-based controls.

7.0 Training and awareness

We provide training to employees to ensure awareness of modern slavery risks and responsibilities, including:

- Online ethics and code of conduct training completed by all new staff
- In person roll out of our new I-CARE Code during Q1 and Q2 2025

These training sessions also encourage employees to report any concerns.

I, Brice Bouffard, hereby certify that the information provided in this slavery and human trafficking statement is accurate and has been approved by the board of directors of Acteon Group Operations (UK) Limited and Acteon Group Limited on 22 June 2026

Brice Bouffard

Brice Bouffard, Group Chief Executive

For and on behalf of Acteon Group Operations (UK) Limited and Acteon Group Limited

Date: 22 June 2026

UK entities covered by this statement: 2H OFFSHORE ENGINEERING LIMITED (02790139), BENTHIC LIMITED (06446868), CLAXTON ENGINEERING SERVICES LIMITED (01927530) – divested from the group in May 2026, INTERMOOR LIMITED (SC167870), LARGE DIAMETER DRILLING LIMITED (06320039), PROBE MANUFACTURING AND FABRICATION LIMITED (01168238) – divested from the group in May 2026, PULSE STRUCTURAL MONITORING LIMITED (07432819) and UTEC NCS SURVEY LIMITED (SC282769)