	BUSINESS MANAGEMENT SYSTEM	Doc Ref: BMS-CP-23	Prepared by: MG
	Corporate Policy	Originated: 07 Mar 2024	Reviewed by: AR
	HUMAN TRAFFICKING AND MODERN SLAVERY POLICY	Revised: 01 Mar 2025	Approved by: FM
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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. What these activities have in common is the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

InterOcean Marine Services Limited has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships including implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

InterOcean is also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

InterOcean's Human Trafficking and Modern Slavery Policy takes into consideration the three pillars of the Ruggie Principles: protect, respect and remedy.

2 SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

3 RESPONSIBILITIES

3.1 Chief Executive Officer

The Chief Executive Officer (CEO) has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.2 Chief Operations Officer

The Chief Operations Officer (COO) has primary and day-to-day responsibility for implementing this policy.

3.3 HSEQ Manager

The HSEQ Manager is responsible for monitoring the use and effectiveness of this policy, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.


3.4 Department Managers

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

4 POLICY

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

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You must notify your Manager or the Officers/Directors as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your Manager or any of the company Officers/Directors.

We aim to encourage openness and will support anyone who raises genuine concerns under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment because of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

5 BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

6 REFERENCE

Policy BMS-HR-06, Disciplinary Policy

Policy BMS-CP-03, Code of Conduct

Policy BMS-CP-06, Equal Opportunities

Policy BMS-CP-18, Business Ethics Policy

Procedure BMS-HSEQ-30, Vendor Evaluation