

# A-2-Sea Solutions Ltd Modern Slavery Statement for Financial Year 2023 / 2024

## Introduction

Section 54 of the UK Modern Slavery Act 2015 (2015 Act) requires commercial organisations operating in the UK with an annual turnover in excess of £36m to produce a 'slavery and human trafficking statement' for each financial year of the organisation.

This statement sets out the steps that A-2-Sea Solutions Ltd (A-2-Sea), a subsidiary of the parent company SubCom LLC, have taken and plan to take in order to minimise the risk of modern slavery and human trafficking within the organisation and its supply chain.

## Statement of commitment

A-2-Sea are committed to ensuring operations are compliant to the 2015 Act regardless of annual turnovers below the £36m threshold.

A-2-Sea seek to foster a better understanding of the 2015 Act and the steps necessary to minimise risk of slavery occurring in its operations and tier 1 supply chains. A-2-Sea acknowledge that organisations who do not demonstrate such commitment are more likely to face greater scrutiny from investors, NGOs, customers, business partners and public contracting authorities.

A-2-Sea are currently working towards a full evaluation of our tier 1 supply chain. Policy is being developed in Corporate and Social Responsibilities (CSR) Environmental Social and Governance (ESG) and other areas of the business to further identify risk in the supply chain and put in place adequate controls to minimise risk to the organisation and our clients. It is expected to take approximately 12 months to fully develop the relevant processes proportional to the organisations scope of work.

## Organisation structure and supply chains.

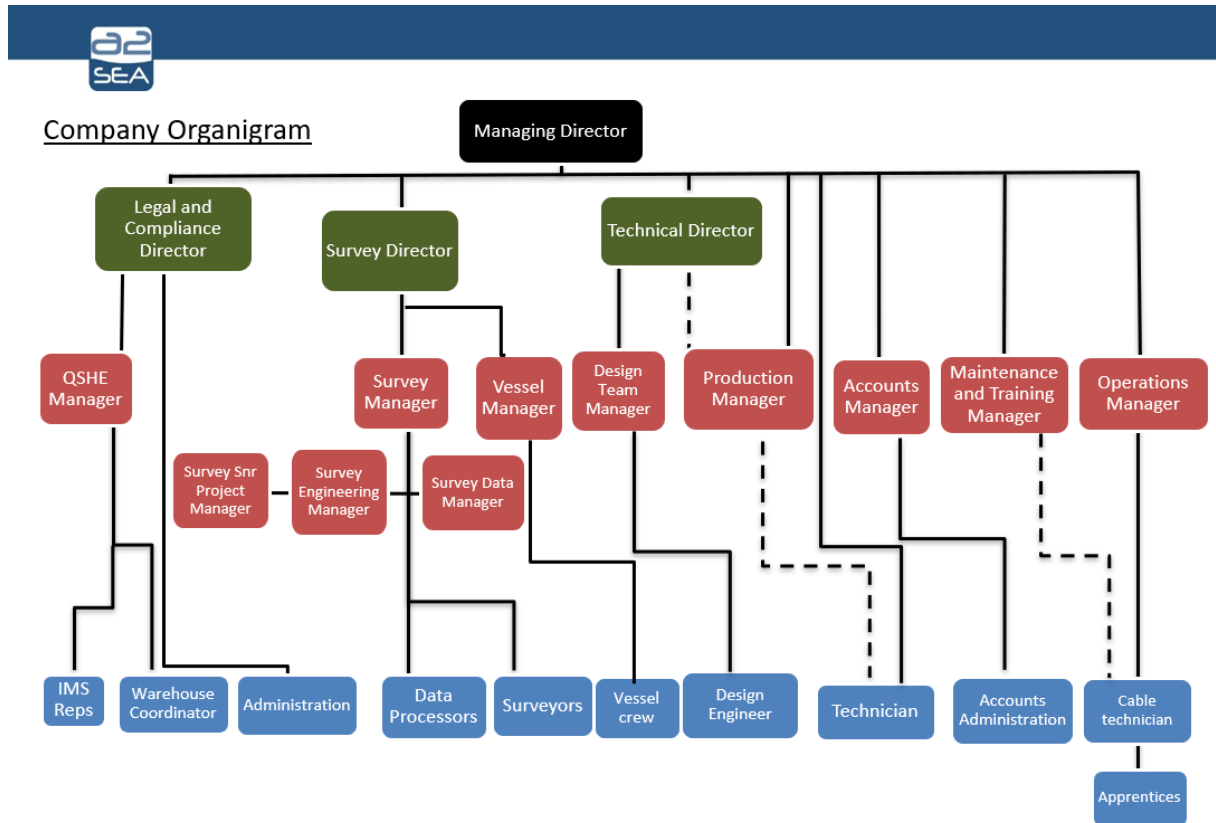
A-2-Sea Solutions Ltd provide a range of products and services unique to the maintenance, installation and seabed mapping of the subsea cable industry. These are managed by a process led approach, which are used to detect risks and opportunities to the business within existing relevant industry and markets.

The scope of A-2-Sea provides a unique service to members of the subsea cable industry. The products and services include and are limited to:

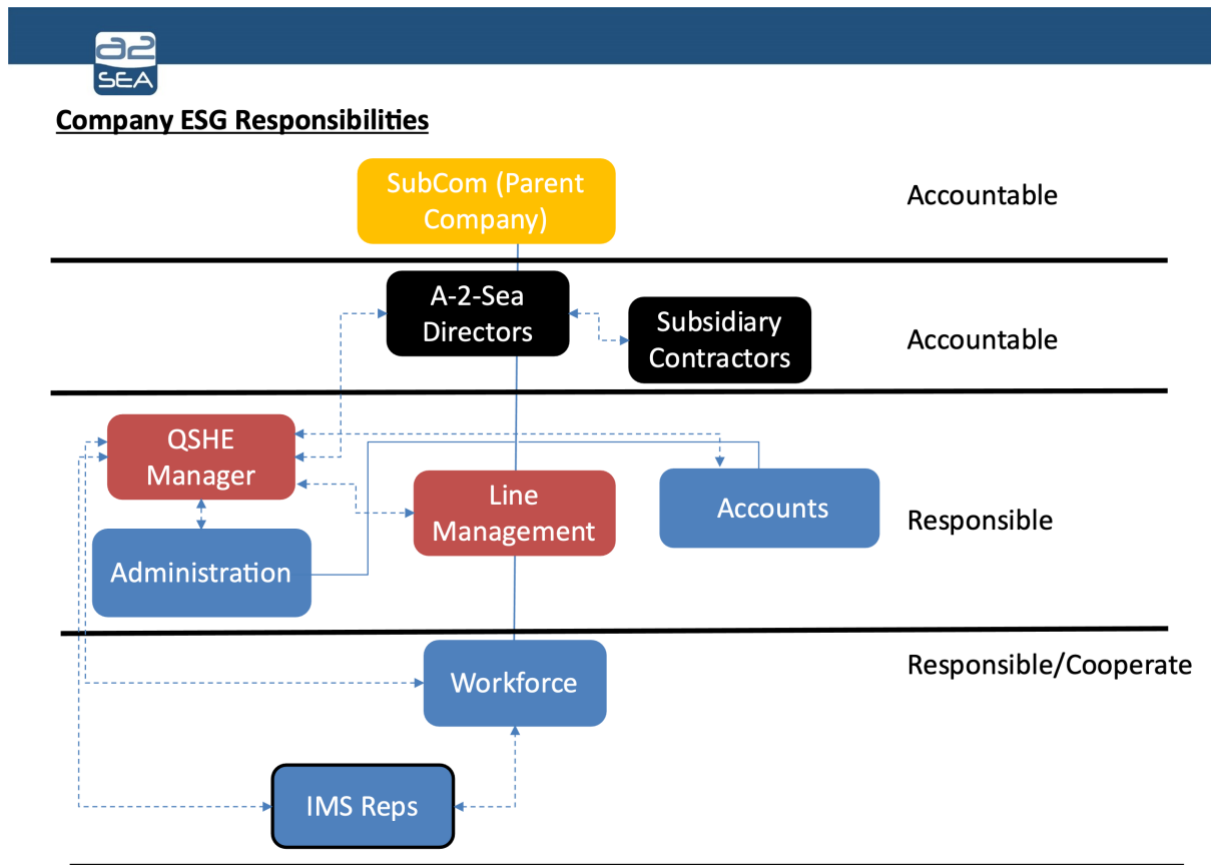
- a) The design, development and manufacture of subsea telecommunication cable joints and related products
- b) The testing of products to ensure conformance to requirements
- c) The installation and maintenance of conforming products
- d) Managing products, such as cables, joint components and equipment, on behalf of customers

- e) Project management of design, development and manufacturing projects on behalf of customers
- f) Sea bed mapping and charting
- g) The safe control of all processes both on-site and off-site to provide confidence in the company's ability to consistently carry out such activities to customer's satisfaction whilst meeting customer compliance obligations and other legal requirements.

**Company structure and shareholders.**



## ESG Responsibilities and Accountabilities



A-2-Sea produce bespoke manufactured products using local fabrication and service providers. All tier 1 suppliers are checked using a third-party vetting agency and are subject to further due diligence checks depending on the size and scope of the supplier. Organisation operations, manufacturing activities and sourcing are controlled and monitored via internal processes in line with ISO 9001, 14001 and 45001 as well as several third-party accreditations.

Freelancers are contracted via credible agencies on a temporary basis, from time to time, according to operational requirements and specific skill sets required to safely perform project related operations. Suitable contractor selection processes are in place to minimise the risk to the organisation and our clients when selecting contractors to support the workforce.

Internal procedures and the use of accounting software to ensure adequate procurement pricing, prompt payment and good planning are in place and periodically monitored by external accreditation bodies as required.

## **Policies in relation to slavery and human trafficking.**

Policies are crucial for developing anti-slavery and anti-trafficking standards across the business and influence suppliers' and employees' decision making on a day-to-day basis. The importance of following agreed anti-slavery and human rights policy, and procedures are impressed upon all employees at A-2-Sea to ensure a consistent and compliant approach towards a zero-tolerance in anti-slavery and human rights.

In order to act ethically and with integrity, A-2-Sea have produced policies and procedures to minimise the risk of violating the human rights of individuals in the tier 1 supply chain, during recruitment of employees, and during work performed in the UK and overseas. All policy and procedures are monitored, updated, endorsed, and signed off by senior management to ensure realistic implementation and compliance is achieved.

A-2-Sea policies specify our expectations of employees, managers, suppliers (in particular, its Tier 1 suppliers), agency workers, business partners and others who are directly linked to business operations, products and services, where reasonably practicable, these expectations are to be enforced at every stage of business conducted by A-2-Sea.

The following policies are available to all employees from the point of their induction, through the company Integrated Management System (IMS). Agency workers and Tier 1 suppliers are also required to adhere to those A-2-Sea policy's, documentation, and processes (as supplied to such agency workers and Teir 1 Suppliers at the commencement of their engagement) in relation to all contracted work.

QMS-PR-007-Purchasing Procedure

QMS-PR-015-Risk Management

HR-PO-008-CSR Policy

HR -PO-007-Company Handbook

HR-PO-016 - Managers code of conduct

57-Approved Supplier Questionnaire

HR-PO-015-Environmental, Social, and Governance (ESG) Policy

HR-PR-003- Staff Recruitment

HR-PR-006 – Employment eligibility Checks

HR-PO-006 – Open door policy

## **Whistleblowing**

We have processes and policies in place for our colleagues, Tier 1 suppliers, and agency workers in order for them to raise concerns confidentiality in relation to any improper, unethical or illegal practices. All concerns raised are reviewed by Senior Management, who decides a way for the matter to be effectively managed. We take a zero-tolerance approach to any form of retaliation against those individuals who raise concerns in good faith. Please refer to our Whistleblowing Policy which can be found in HR -PO-007-Company Handbook.

## **Management**

Our QSHE Manager is responsible for ensuring compliance with this policy and those additional relevant policies mentioned above. The QSHE Manager also ensures that appropriate efforts are made to investigate and manage the risk of modern slavery to our business and ensures that basic labour standards are met at all times.

### **Due diligence processes.**

We undertake due diligence using our parent company's vetting software before deciding to contract with suppliers, this process consists of thorough on boarding checks that consider risks such as country of origin and financial crime indicators. A-2-Sea are currently reviewing relevant company policies, monitoring the tier 1 supply chain to develop our approved supplier list, and developing existing due diligence processes. Relevant employee awareness training is also currently planned, and a full review is estimated to be completed within 12 months.

An assessment of the risks linked to modern slavery is currently underway and will include amongst others: the lack of regulation in source countries, complex employment arrangements, presence of vulnerable workers, absence of worker representation and rights, the probability of forced labour, and the monitoring of health and safety during UK and overseas operations conducted by A-2-Sea.

Impact assessments will include evidence of, and findings from project planning of operations and how lessons learned, and other relevant considerations can be implemented in future project planning.

It is A-2-Sea's intention to:

- Embed respect for human rights and zero tolerance of modern slavery across the business
- Address any identified risks of modern slavery
- Monitor and evaluate measures in place
- Communicate and report non-conformance regarding human rights and modern slavery.

### **Risk assessment and management.**

A-2-Sea are currently undertaking a review of all tier 1 suppliers with the intention to investigate further into those suppliers who demonstrate characteristics of higher potential for modern slavery risk. Suppliers who demonstrate a higher risk will be requested to provide further information into their compliance and due diligence regarding modern slavery and human rights. An internal A-2-Sea review will take place to determine the level and sufficiency of supplier due diligence. If measures highlighted in the review are sufficiently improved, the supplier will be monitored for compliance. If the supplier fails to improve or improvements deteriorate over time, the relationship would be re-evaluated and if necessary, terminated.

### **Key performance indicators to measure effectiveness of steps being taken.**

Where potential modern slavery impacts are identified within a contract requirement, A-2-Sea will work with our suppliers and clients to develop appropriate KPIs to monitor and manage performance in regard to these risks.

In addition, in order to assess the risk of modern slavery and human trafficking to our business, and the effectiveness of the steps taken by us to ensure that slavery and human trafficking is not in place in our business, we periodically complete an Anti-Slavery and Human Rights Impact Assessment.

#### **Training on modern slavery and trafficking.**

Specific training sessions, proportionate to the level of risk regarding modern slavery, will be provided to all employees (including managers) on their induction and throughout their employment who may be involved in procurement, project planning and site work. We also maintain an audit trail to record each training session, and the contents of such training, that has taken place.

#### **Next Steps**

As mentioned above, A-2-Sea are in the process reviewing relevant company policies, monitoring the tier 1 supply chain (including reviewing all Tier 1 suppliers), and developing existing due diligence processes. We are utilising our ISO 9001 Continuous Improvement Policy to identify next steps to effectively pinpoint areas requiring improvement. We consistently allocate sufficient resources that are dedicated to monitoring, training, and enforcement to ensure that no modern slavery or human trafficking is present in our business or supply chains.