



ZODIAC MARITIME LIMITED

MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2021

Introduction

This statement is published in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Zodiac Maritime Limited (“ZML”) during the financial year ending December 2021 to identify, prevent, and mitigate the risk of modern slavery.

Modern slavery is a crime and a violation of fundamental human rights which takes various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking (“Modern Slavery”).

ZML does not tolerate Modern Slavery and conducts its business in a fair, ethical, and responsible manner and is committed to its responsibilities to respect and uphold human rights across its business, workforce, and sphere of influence.

Previous versions of ZML Modern Slavery Statements are publicly available on ZML’s website: <https://www.zodiac-maritime.com/public/modern-slavery-statement.xhtml>.

Organisation Structure & Supply Chain

ZML is an international ship management company, headquartered in London with representative offices in Shanghai, Tokyo, and Mumbai.

ZML provides a full suite of ship management services to its clients, including commercial, technical, and crewing management, and is dedicated to the provision of high-quality tonnage to the international maritime industry.

ZML’s supply chain comprises reputable companies/agencies located worldwide who supply such goods and services as necessary for the safe and continued operation of the ships under its management.

Policies/Due Diligence Processes in Relation to Slavery & Human Trafficking

In keeping with its wider commitment to act ethically and with integrity in all its business activities and relationships, ZML maintains policies and procedures, including due diligence processes, which assist in the identification, prevention, and mitigation of risks in relation to Modern Slavery, including:

- Anti-bribery and corruption policy – This sets out ZML’s approach to prevent and detect bribery and corruption, addressing practices which may be indicators of Modern Slavery risks.
- Health, safety, security, and environmental policy.
- Procedures for ensuring compliance with international labour standards including the Maritime Labour Convention 2006 (covering compliance with standards for working and employment conditions, and child labour/protection arrangements prohibiting the employment of children).
- Personnel – ZML does not use forced or compulsory labour. ZML’s employees are recruited and provided with working conditions that comply with all applicable laws and regulations. Guidelines cover personnel conduct, including any form of discrimination, harassment, abusive conduct, and unlawful activity.
- Recruitment procedures – These include arrangements for checking, validating licenses/right to work permits, and identity.



ZODIAC MARITIME LIMITED

- Security procedures – Undertaking specialist checks in high-risk areas to prevent the stowing away of persons on board vessels and arrangements for returning any identified individuals into the care of the appropriate competent authority.
- Supplier Business Ethical Trading Policy.
- Whistle-blowing policy – To deal with any concerns in respect of internal or external activity, including in relation to the management of ZML's suppliers or impacts on ZML's supply chain, with safeguards to protect any whistle-blowers.

ZML's policies and procedures (including those related to Modern Slavery) are kept under continuous review and these are updated periodically as appropriate.

Risk Assessment & Management

ZML expects all personnel and counterparties in its supply chain to comply with all applicable laws and regulations and to maintain high ethical standards. ZML will carefully monitor such matters and reserves the right to cease trading with such counterparties and take any other action as appropriate.

ZML has assessed the specific Modern Slavery risks within the maritime sector including, without limitation:

- human trafficking through the inadvertent transport of persons stowed away on-board vessels
- heightened risks in dealing with companies based in jurisdictions which do not have equivalent standards to the UK

ZML's policies and procedures are designed to address these risks and are communicated to all relevant staff, including those on-board our managed vessels.

In regard to the continuing implications of the COVID-19 pandemic, which has substantially altered the landscape of the global workforce, exacerbating modern slavery risks within supply chains and operating models, ZML has continued to work with affected suppliers and other stakeholders to seek to constructively manage the subsequent impact and challenges of the pandemic. ZML maintains continuity plans and health protection measures, and safety protocols across its managed vessels, infrastructure, and offices to mitigate the impact on ZML's supply chain and operating model, particularly with respect to resource availability and extended response times, and in relation to its staff health, safety, and wellbeing.

ZML continues to monitor the risks and challenges, and subsequent impacts on its supply chain and operating model and adapt its procedures, activities, and priorities as appropriate in line with its commitment to responsible business practices and national/international guidelines.

Key Performance Indicators to Measure Effectiveness of Steps Taken

ZML's policies and procedures facilitate the identification of Modern Slavery risks within its business or supply chains, either through the raising of any potential violations of law or internal arrangements by personnel or through oversight arrangements (including management information and its internal audit program), enabling management to actively consider and to enhance existing arrangements to further mitigate such risks.

ZML is committed to improving its practices to combat Modern Slavery and continues to evolve the way in which it identifies and mitigates Modern Slavery risks within its business and supply chains and to measure the effectiveness of its policies and procedures. During this period, ZML has continued to review and update its relevant policies and procedures e.g. enhancing its Whistleblowing



ZODIAC MARITIME LIMITED

arrangements providing further guidance with respect to relevant disclosures and reporting arrangements, further developing the ZML compliance infrastructure.

ZML monitors industry and regulatory developments pertaining to modern slavery considerations and welcomes the recent report in April 2022 by the Financial Reporting Council ("FRC") with respect to general modern slavery reporting practices in the UK, and ZML continues to enhance its practices as appropriate.

Training on Modern Slavery & Trafficking

All ZML personnel a) receive initial training on its policies and procedures and receive ongoing training as appropriate, and b) are provided with access to its intranet which contains all information pertaining to its policies and procedures.

This statement was approved by the Board of Directors on the 28th June 2022.

Signed:

Daniel Ofer, CEO

Zodiac Maritime Limited

Date: 29/06/2022

