



Modern Slavery Statement 2026

Introduction

This statement is made in accordance with the requirements of the Modern Slavery Act 2015 (“the Act”). It sets out the steps that Starship TopCo Limited, and all its subsidiaries (‘OEG’) have taken to mitigate the risk of modern slavery and human trafficking operating within either its own business or its supply chains and the steps it will take to increase its oversight and awareness.

At OEG, we respect human rights and do not tolerate any form of slavery. We recognise that no supply chain is without risk of modern slavery, and it is our responsibility to ensure we understand these risks and work in partnership with our suppliers to mitigate them.

OEG and its subsidiaries support the objectives of the Act of eliminating slavery and human trafficking. This statement is made on behalf of OEG, which operates across 6 continents.

Our Company Structure

OEG is headquartered in Aberdeen, Scotland and has roots dating back to 1973. We provide offshore logistics equipment and bespoke solutions for above-water, on-water, and below-water applications. OEG delivers integrated services for larger project work scopes to support the development, construction, operation, maintenance, and decommissioning of energy assets and infrastructure. We have approximately 1,500 colleagues, serving customers in 76 countries with hub locations in all the main energy provinces. We also operate distribution agency agreements with key country partners for our product range. OEG has developed an international reputation for quality, safety and providing cost-effective services for our customers.

Our Supply Chain

OEG procures a range of goods and services from a variety of suppliers.

For operational consumables used on a day-to-day basis, we use local supply centres where possible. Whereas our large capital items are normally sourced from specialist manufacturers who are frequently based in the Far East.

We have adopted a risk-based approach to assessing our business and supply chain, which involves considering geographical, industry, and market factors to identify categories of supply that may present a higher risk of modern slavery.

Our Organisational Policies

It is OEG policy to conduct its business in an honest and ethical manner. OEG takes a zero-tolerance approach to modern slavery and human trafficking and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships. We are committed to the prevention, deterrence, and detection of modern slavery. We aim to maintain slavery and human trafficking compliance as “business as usual” rather than as a one-off exercise.

The following resource links are provided for website visitors to further expand awareness.

<https://www.gov.uk/government/collections/modern-slavery>

[Modern Day Slavery Policy](#) - In 2017, we established our Modern Slavery Act Policy, which is now part of our global management system, which is an OEG mandatory requirement for all companies.

[Supplier Code of Ethics](#) – our Supplier Code of Ethics covers commitments against corrupt practices and commitments to ethical and environmental standards. This code exists to protect our relationship with suppliers and sets out the high standards of expectations within our global business.



Modern Slavery Statement 2026

[Whistleblowing Policy](#) – In 2016, specific reference to modern slavery was added to our Whistleblowing Policy, which has been posted on our website to raise awareness on how anyone can raise a concern.

These policies cover statutory requirements and internationally recognised standards as set out in the UN Universal Declaration of Human Rights, the International Labour Organisation Conventions, and the Act.

Our Risk Assessment and Due Diligence Processes

We recognise the importance of maintaining constant vigilance to identify and address any impacts associated with modern slavery and human trafficking throughout our supply chains. In recognition of these issues, we are committed to continuing to enhance our capacity to identify, prevent and mitigate any impacts in this field. Our various management teams are required to consider their own supply chain and to assess the level of risk relating to modern slavery and human trafficking.

In those areas of our businesses where we source goods from countries where forms of modern slavery are more likely to be prevalent, we undertake the following activities to assess and address this risk:

- Conducting an internal risk assessment to identify which of OEG's suppliers are most likely to manufacture goods or provide services in countries and/or sectors where instances of modern slavery are more likely to be prevalent;
- Consulting with those suppliers whom we have identified as presenting significant inherent risk to understand more about their own businesses, supply chains, and the steps they have taken to reduce the risk of slavery and human trafficking;
- Constantly reviewing OEG's existing contractual agreements and identifying ways these can be strengthened to further reduce the risk of modern slavery and human trafficking in our businesses and supply chains; and
- Maintaining our policies and systems to promote, protect and enable whistleblowing.

We continue to monitor OEG's businesses and our supply chain to assess ongoing risks and develop measures to further reduce the risk of slavery and human trafficking taking place.

Review of Evaluation Process and Monitoring

We measure our effectiveness in ensuring that modern slavery and human trafficking are not taking place in our business or supply chains.

For example, as part of our supplier engagement campaign, we integrated modern slavery clauses within our contracts and continue to process enrolment forms for new material suppliers. We also continue to monitor our supply chain during key/critical supplier audits.

We shall use the following key performance indicators ("KPIs") to measure how effective we have been in ensuring that modern slavery and human trafficking are not taking place in any part of our business or supply chain:

- Completion of supplier audits;
- Annual declaration on compliance from our key/critical suppliers; and
- Annual declaration from senior management on their compliance with our policy and the Act.



Modern Slavery Statement 2026

This statement is reviewed and updated annually.

Future Actions

It is important that we continually develop and improve our awareness, understanding and performance in relation to human rights and modern slavery, and we will report on our progress each year. In addition, we will specifically look at integrating the following elements:

- We will continue reviewing specific existing guidelines to ensure that our steps in reducing slavery and human trafficking remain relevant and valid;
- We will increase awareness of slavery and human trafficking across the business through visible communications across OEG. We will also deliver advanced online training to employees with key responsibilities in our supply chain and our senior management team. This advanced level of training will allow colleagues to provide guidance and information to other employees or suppliers as necessary; and
- We will continue to promote awareness of our whistleblowing policy to create and enforce a culture where anyone worried about an ethical issue feels confident to speak up about it, even if they just have a suspicion. They can report their concerns on the phone or online through our website – anonymously if they prefer (subject to local laws). This portal is open to employees, contractors, and suppliers.

Declaration

This OEG modern slavery and human trafficking statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2026 and is approved by the Board.

For and on behalf of

Starship TopCo Limited and all its subsidiaries

A handwritten signature in blue ink, appearing to read 'JH Heiton'.

John Heiton

Chief Executive Officer

Date: 03Mar2026