MODERN SLAVERY STATEMENT

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INTRODUCTION

Impact Subsea is committed to protecting and respecting Human Rights and have a zero-tolerance approach to slavery and human trafficking in all forms. This statement is intent on addressing the Company's actions taken in recognition of the risks of modern slavery and human trafficking; in line with the Modern Slavery Act 2015 and the Human Trafficking and Exploitation (Scotland) Act 2015.

The term 'Modern Slavery' is intended to encompass all forms of illegal exploitation including human trafficking, slavery, servitude and forced or compulsory labour. We understand that the nature of this crime is ever-changing and are dedicated to adapting our business practices to best observe all necessary steps in combatting all forms of modern slavery.

OUR STRUCTURE AND BUSINESS

Impact Subsea design and manufacture a range of subsea sensing solutions, encompassing altimeters, depth sensors, sonar and more. The company operates on a global level, both directly and in cooperation with a <u>Global Distributor</u> Network.

Our Distributor Network

As part of Impact Subsea's Business Management System, potential Distributors undergo a screening process in an effort to ensure a synergistic relationship may be established prior to official appointment. We trust that appointed Distributors maintain their own appropriate controls and measures to combat modern slavery.

Our Supply Chain

We recognise the risks of modern slavery within supply chains for all types of goods and services. Similar to our Distributors, all potential suppliers undergo a strict screening process and approved suppliers are reviewed regularly in accordance with our Business Management System.

If evidence were found indicating modern slavery in our supply chains or distributor network, we recognise our responsibility to address this issue with those involved and reserve the right to terminate contracts where serious violations are discovered.

RESPONSIBILITIES & TRAINING

Appropriate staff training is given to promote awareness and understanding of the risks of modern slavery in our business practices. Identifying potential victims of modern slavery can be a challenge due to the multifaceted nature of the crime. In light of this, Impact Subsea encourages openness and support to anyone who raises genuine concerns in good faith. No one should suffer any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery may be taking place in any part of the Company's practices.

Overall accountability for risk management and internal controls are the responsibility of Impact Subsea's Directors.

POLICY

Impact Subsea has a zero-tolerance approach to modern slavery and is committed to acting ethically, with transparency and integrity in all business practices. The company expects the same high standards from suppliers, contractors, distributors and all other relevant business partners.

Though a challenge to identify potential victims, all Impact Subsea employees must avoid any activity that might lead to a breach of this policy. If any staff member suspects a breach of - or conflict with - this policy should immediately report to their line manager. Prevention, detection and reporting of modern slavery in any part of business practices, whether in the UK or abroad, is the responsibility of all Impact Subsea staff.