

Modern Slavery Statement – 2020

1 INTRODUCTION

- 1.1** This statement (the “**Statement**”) is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the actions taken by AI Mistral Topco Ltd and its subsidiaries and/or affiliates as set out in Schedule 1 (together “**V.Group**”) to understand all potential modern slavery risks related to its business, and steps being put into place that are aimed at ensuring that there is no slavery, human trafficking or child labour in its own business and its supply chains.
- 1.2** This Statement relates to actions and activities during the financial year 1 January 2020 to 31 December 2020 and has been published within 6 months of its financial year-end. V.Group is absolutely committed to preventing and ensuring that its supply chains are free from slavery, human trafficking and child labour in its corporate activities.

2 ORGANISATIONAL STRUCTURE

- 2.1** V.Group provides maritime services globally to a range of clients. V.Group is split into 3 main functions:
- (a) Ship Management;
 - (b) Crewing; and
 - (c) Marine Services.

3 DUE DILIGENCE

- 3.1** V.Group undertakes due diligence when considering taking on new suppliers and clients, and regularly reviews its agreements with existing suppliers and clients. In respect of Ship Management and Crewing, V.Group carry out due diligence on potential clients through a ‘Know Your Client’ process to ensure that certain minimum criteria for new business are met, including due diligence checks and ensuring that any crewing agreement must be in line with ITF agreements.

4 SHIP MANAGEMENT, CREWING AND MARINE SERVICES

- 4.1** We contract on our standard terms and conditions which require that our clients and suppliers comply with modern slavery provisions.

5 CREWING

5.1 Recruitment

The majority of crew that V.Group put on board vessels are recruited by V.Group’s crew management offices which are MLC-compliant. Where V.Group recruit externally, only approved Recruitment & Placement Centres who are independently approved to be MLC-compliant are used.

5.2 Contracts

Every crew member who V.Group engages (whether as agent on behalf of a principal or directly) is party to an employment contract which is compliant with the Maritime Labour Convention (MLC) and so is internationally recognised by the International Labour Organisation as providing certain labour standards. For example, crew are paid wages which satisfy minimum wage requirements.

5.3 Seafarers' Charter and 'Speak Up' hotline

There is a Seafarers' Charter and 'Speak Up' hotline for all seafarers engaged by V.Group to raise concerns. These are investigated whilst keeping the identity of the whistleblower anonymous.

6 SUPPLY CHAIN

6.1 We have in place the following:

- (a) Supplier Code of Conduct (setting out the standards expected of all our suppliers); and
- (b) Procurement Policy (setting out our own standards expected of our employees).

6.2 The above make clear that we expect our suppliers and employees to comply with the Modern Slavery Act 2015.

6.3 Our supplier agreements require that any (i) new suppliers and (ii) existing suppliers whose contracts are renewed, must comply with the Modern Slavery Act 2015.

6.4 We have set up an automated process to obtain confirmations from suppliers that they comply with the Modern Slavery Act 2015. We are currently updating all our suppliers' records on the system and aim to have this completed by the end of the year.

7 RELEVANT POLICIES

7.1 We have Compliance & Ethics policies which V.Group must adhere to: <https://vgrouplimited.com/legal/compliance>

7.2 Speak Up Policy

This allows our employees and other workers to make disclosures without fear of retaliation.

7.3 Social Responsibility Policy

V.Group attaches great importance to acting socially responsibly and works with stakeholders to help achieve this.

7.4 Recruitment Policy

Only reputable employment agencies are used to source labour and the practices of any new agency are verified before accepting workers from that agency. All new employees must provide proof of their identification and right to work in the country of appointment. This involves physical checks of employee's eligibility to work and reside documents.

8 POLICY

8.1 A current version of our modern slavery policy is available at <https://vgrouplimited.com/legal/compliance/>

9 TRAINING AND AWARENESS RAISING

9.1 In July 2019, V.Group released its training course covering modern slavery. As at the date of issue of this Statement, this has been completed by 94% of all employees. The course draws on the policy referred to in Paragraph 8.1 and covers:

- (a) the basic principles of the Modern Slavery Act 2015; and
- (b) how employers can identify, flag up and prevent slavery, human trafficking and child labour.

10 DOCUMENT CONTROL

10.1 The General Counsel of V.Group is the owner of this Policy and is responsible for ensuring that this procedure is reviewed in line with the relevant review requirements.

10.2 A current version of this Statement is available at <https://vgrouplimited.com/legal/compliance/>

10.3 A link to this Statement is published on the UK website of the companies covered by this Statement. A copy of this Statement has also been uploaded onto the Modern Slavery statement registry at modern-slavery-statement-registry.service.gov.uk

10.4 This Policy was approved by the Board of Directors as stated in this Section and is issued on a version-controlled basis.

Version	Date of Issue	Approved by	Position
1	14.06.2021	Graham Westgarth	Chairman



Signed:
GRAHAM WESTGARTH
CHAIRMAN

Schedule 1

	Company
1.	AI Mistral Finance Corporation
2.	AI Mistral Holdco Limited
3.	AI Mistral Limited
4.	AI Mistral Parentco Limited
5.	AI Mistral Topco Limited
6.	Alship Services & Trading Limited
7.	Alvada Insurance Inc
8.	Angel Bay Marine Services Inc
9.	AS Baltic Group International
10.	Baltic Group International Far East JSC
11.	Baltic Group International Georgia Limited
12.	Baltic Group International Novorossiysk Ltd
13.	Baltic Group International St Petersburg JSC
14.	Bellatrix Ship Management Group Limited
15.	Celtic Marine (Hong Kong) Ltd
16.	Dania Ship Management
17.	Dania Ship Management Bulk AS
18.	Dania Ship Management Holding AS
19.	E-Hub Corporate Services (Pvt) Ltd
20.	Global Marine Travel (UK) Limited
21.	Global Marine Travel LLC
22.	Global Marine Travel Ltd
23.	GMT Holdings Corp
24.	Graig Ship Management (Shanghai) Co Ltd

25.	Graig Ship Management Limited
26.	H.Schuldt Shipbrokers (Asia) Pte Ltd
27.	H.Schuldt Shipbrokers GmbH & Co KG
28.	V.Scope (Germany) GmbH & Co KG
29.	Inter Argo PH Inc.
30.	Inter Marine Services Management Ltd
31.	International Tanker Management Limited
32.	ISS GMT B.V.
33.	Kestrel Shipping Incorporated
34.	Marcas International Ltd
35.	Marine Legal Services Limited
36.	Marlins Training Ltd
37.	Marlins Maritime Training Foundation
38.	Martinoli S.A.M.
39.	Monaco Holdings Inc
40.	Murray Fenton (India) Surveyors Private Ltd
41.	V.Ships (Hamburg) GmbH & Co KG
42.	North Sea Marine Services Corporation
43.	Northern Crewing Services GmbH & Co. KG
44.	OCL Oceanic Catering Limited
45.	Pacific Marine International Group Holdings Inc
46.	Pacific Ocean Manning Incorporated
47.	SC V.Ships (Ukraine)
48.	Seatec China Limited
49.	Seatec UK Ltd
50.	Selandia Crew Management (India) Pvt Ltd

51.	Selandia Crew Management Philippines Inc
52.	Selandia Crew Management Pte Ltd
53.	Selandia Holdings Pte Ltd
54.	Selandia Ship Management (India) Pvt Ltd
55.	Selandia Ship Management (Singapore) Pte Ltd
56.	Selandia Ship Management Pte Ltd
57.	SIA LAT. B.G.I.
58.	Seatec Services Pte Ltd
59.	Seatec Services SDN.BND
60.	V Ships UK Group Ltd
61.	V.Companies Limited
62.	V.Group Global (Singapore) Pte. Ltd
63.	V.Group Limited
64.	V.Group Manpower Services Limited
65.	V.Holdings Limited
66.	V.Holdings Manpower Pvt Ltda
67.	V.Hong Kong Limited
68.	V.Hub Ltd
69.	V.Manpower Philippines Inc Dormant
70.	V.Scope Risk Management Ltd
71.	V.Ships (Germany) GmbH
72.	V.Ships (Isle of Man) Limited
73.	V.Ships (Papua New Guinea) Ltd
74.	V.Ships (PL) SP. Z.O.O.
75.	V.Ships (Shanghai) Ltd
76.	V.Ships Asia (Private) Limited

77.	V.Ships Asia Group Pte Ltd
78.	V.Ships Bangladesh Private Limited
79.	V.Ships Brasil Offshore S.A.
80.	V.Ships Brasil S.A.
81.	V.Ships Bulgaria Limited
82.	V.Ships Canada Inc
83.	V.Ships Croatia Ltd
84.	V.Ships Denmark Holdings
85.	V.Ships France S.A.S
86.	V.Ships Germany Holding GmbH
87.	V.Ships Greece Limited
88.	V.Ships Group Ltd
89.	V.Ships India Private Ltd
90.	V.Ships Istanbul Denizcilik Hizmetleri Ltd
91.	V.Ships Italy srl
92.	V.Ships Leisure (USA) LLC
93.	V.Ships Leisure Limited
94.	V.Ships Leisure S.A.M.
95.	V.Ships Limited
96.	V.Ships Management Limited
97.	V.Ships Manpower srl
98.	V.Ships Monaco S.A.M
99.	V.Ships N.Z. Ltd
100.	V.Ships Norway AS
101.	V.Ships Offshore (Asia) Pte Ltd
102.	V.Ships Offshore Limited

103.	V.Ships Offshore Ukraine
104.	V.Ships plc
105.	V.Ships Property Ltd
106.	V.Ships Services Oceana Inc
107.	V.Ships Ship Management (India) Pvt Ltd
108.	V.Ships UK Limited
109.	V.Ships USA LLC
110.	VGG India Private Limited
111.	VGG Services Limited
112.	Vouvray Acquisition Limited
113.	Vouvray Finance Limited
114.	Vouvray Holdings Limited
115.	Vouvray Midco Limited
116.	Vouvray US Finance LLC
117.	VS Marine Pvt Limited
118.	VShips Cyprus Ltd
119.	Worldwide Property Limited
120.	Somaritim SAS
121.	V.Ships Managing Services Ltd