

Modern Slavery Statement – 2021

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 2021 to 31 December 2021 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 is 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 Maritime Labour Convention (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 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 92% 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 Statement and is responsible for ensuring that it is reviewed in line with the applicable 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 Statement 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	04.07.2022	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 LLC
21.	GMT Holdings Corp
22.	Graig Ship Management (Shanghai) Co Ltd
23.	H.Schuldt Shipbrokers GmbH & Co KG
24.	V.Scope (Germany) GmbH & Co KG

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

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

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

103.	VGG India Private Limited
104.	VGG Services Limited
105.	Vouvray Acquisition Limited
106.	Vouvray Finance Limited
107.	Vouvray Holdings Limited
108.	Vouvray Midco Limited
109.	VS Marine Pvt Limited
110.	VShips Cyprus Ltd
111.	Worldwide Property Limited
112.	Somaritim SAS
113.	V.Ships Managing Services Ltd
114.	V.Services Ukraine LLC
115.	V.Crew (Shanghai) Ltd
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