



Modern Slavery Statement – 2022

1 Introduction

- 1.1 Al Mistral Topco Ltd and its subsidiaries and/or affiliates as set out in Schedule 1 (together “**V.Group**”) are committed to their practices to combat slavery and human trafficking in their business and supply chain. This statement (the “**Statement**”) is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the actions taken by 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 2022 to 31 December 2022 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 2 main functions:
- (a) Ship Management (which includes crewing operations); and
 - (b) Marine Services (“**V.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. V.Group carries 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 every crewing agreement is in line with ITF agreements.

4 Ship Management and V.Services

- 4.1 We contract on our standard terms and conditions which require that our clients and suppliers comply with modern slavery provisions.
- 4.2 *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.



4.3 *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.

4.4 *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.

5 **Supply Chain**

5.1 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).

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

5.3 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.

5.4 We have set up an automated process to obtain confirmations from suppliers that they comply with the Modern Slavery Act 2015.

6 **Relevant Policies**

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

6.2 *Speak Up Policy*

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

6.3 *Social Responsibility Policy*

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

6.4 *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.

7 Policy

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

8 Training and Awareness Raising

8.1 In July 2019, V.Group released its training course covering modern slavery. As of July 2022, this has been completed by 91% of employees (NB: we have a headcount of 2537 and 2312 employees completed this training). The course draws on the policy referred to in Paragraph 7.1 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.

9 Document Control

9.1 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.

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

9.3 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

9.4 This Statement was approved by the Board of Directors as stated in this Section and is issued on a yearly basis.

Date of Issue	Approved by	Position
29 June 2023	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.	Baltic Group International Far East JSC
10.	Baltic Group International Georgia Limited
11.	Baltic Group International Novorossiysk Ltd
12.	Baltic Group International St Petersburg JSC
13.	Bellatrix Ship Management Group Limited
14.	Celtic Marine (Hong Kong) Ltd
15.	Dania Ship Management
16.	Dania Ship Management Bulk AS
17.	Dania Ship Management Holding AS
18.	E-Hub Corporate Services (Pvt) Ltd
19.	Global Marine Travel LLC
20.	GMT Holdings Corp
21.	H.Schuldt Shipbrokers GmbH & Co KG
22.	V.Scope (Germany) GmbH & Co KG
23.	Inter Argo PH Inc.
24.	Inter Marine Services Management Ltd



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



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



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



102.	Vouvray Holdings Limited
103.	Vouvray Midco Limited
104.	VShips Cyprus Ltd
105.	Worldwide Property Limited
106.	Somaritim SAS
107.	V.Ships Managing Services Ltd
108.	V.Services Ukraine LLC
109.	V.Crew (Shanghai) Ltd
110.	Maritime Payments Solutions LLC
111.	MPS Corporate Payments LLC
112.	
113.	
114.	
115.	