



# Anti-Modern Slavery Statement

**DATE**

April 2024

**REVISION**

Issue A

**APPROVED BY**

CEO

**DOCUMENT CODE**

[omitted]

**OWNER**

General Counsel

**OCEAN INFINITY®**

Ocean Infinity Group Limited  
17 Grosvenor St, Mayfair, London W1K 4PZ  
oceaninfinity.com



This statement is made by Ocean Infinity Group Limited (thereafter “Ocean Infinity” or “OI”) for itself and on behalf of its affiliates pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and in respect of the financial year ended 31 December 2023 (the “Financial Year”).

## 1. Business Mission and Structure

Ocean Infinity has been built on a mission to use innovative technology to transform operations at sea and enable people and the planet to thrive. That is why the company has a zero tolerance for modern slavery or human trafficking within its supply chain, is supportive of the objectives of the Act and seeks to apply the requirements of the Act throughout its group.

Ocean Infinity is a technology company that collect marine data at scale to serve clients worldwide across a wide array of different industries. It has personnel in various locations, including the UK, US, Canada, Portugal, Sweden, Norway, Singapore, New Zealand, and Australia as well as offshore. The company’s procurement team sit at Group level to ensure that the Act and other best practices are upheld across all procurement and supplier activities.

## 2. Procurement Practices

Ocean Infinity’s business is carried out by a highly skilled workforce and Ocean Infinity considers that it has a fairly simple supply chain. Significant parts of its supply chain comprise information technology, robotics and vessel equipment procurement and manufacturing that require highly skilled personnel. Ocean Infinity therefore considers that there is a comparatively low risk of slavery and trafficking in its supply chain.

Ocean Infinity continues to deploy the three-pillared approach to its supply chain management described in its 2022 statement.

The Ocean Infinity sustainable procurement strategy is focused on ensuring that all staff involved in the procurement of goods and services understand the impact of their supply chains environmentally, socially, and economically. The procurement strategy and process have been developed in line with the Act.

During the Financial Year, Ocean Infinity expanded its procurement team and updated and circulated its supplier code of conduct.

## 3. Supplier Verification

Ocean Infinity expects all its suppliers to comply with all applicable laws and regulations in operating their businesses, including with respect to preventing slavery and human trafficking. OI also conducts structured self-assessments, verifications, and audits of our key suppliers. Ocean Infinity has developed a ‘Responsible Procurement Assessment Tool’ to screen potential suppliers and assess their commitment and actions to benefit people and the planet. This includes verifying their commitment to the Act. Additionally, Ocean Infinity’s standard supplier terms of business require compliance with the Act.



## 4. Confidential Reporting

A confidential whistleblowing hotline and web-reporting page has been established for employees, contractors, and suppliers to use if they see any breach of the Act or any other misconduct. Confidential reports go straight to external, independent professionals trained in upholding the Act.

## 5. Education and Awareness

Ocean Infinity has made relevant staff aware of its position on modern slavery and human trafficking as well as the requirements of the Act. Ocean Infinity will keep the effectiveness of its arrangements to prevent the use of slavery and human trafficking in its supply chain under review and will act as and when required.

During the Financial Year, compulsory training on understanding and identifying modern slavery for all staff was deployed on Ocean Infinity's global intranet, and Ocean Infinity's procurement team participated in in-house contract negotiation training.

[signed]

.....

**Oliver Plunkett**

**Director**

**For and on behalf of Ocean Infinity Group Limited and its subsidiaries**

**Date April 2024**