

	DEEPWAVE GROUP - MODERN SLAVERY STATEMENT – 2025	Rev.	A0
		Date	24.07.2025
		Page	1 of 2
	DW-IMS-POL-017		

DEEPWAVE GROUP - MODERN SLAVERY STATEMENT – 2025

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 (the “Act”).

Introduction

Deepwave Group (“Deepwave”) is committed to the highest ethical standards and takes a zero-tolerance approach to modern slavery and human trafficking. This statement outlines the steps we have taken during the financial year ending 31 April 2025 to ensure that modern slavery and human trafficking are not occurring in our business or supply chains.

Our Organisation

Deepwave is a global provider of subsea services including seabed clearance, construction support, inspection, survey, diving, and trenching services. Headquartered in Switzerland, with entities in the United Kingdom (Deepwave UK), Italy (Deepwave SRL), and the UAE (Deepwave ME), we serve offshore energy and infrastructure sectors worldwide.

Our Supply Chains

We work with suppliers globally, including in jurisdictions with higher modern slavery risks, and enforce high ethical standards through contractual obligations and ongoing engagement. Our supply chains include:

- Offshore vessel owners and operators.
- Equipment suppliers (ROVs, survey, diving, trenching).
- Technical consultants and agency personnel.
- Subcontracted engineering and logistics providers.

Policies and Governance

Our Modern Slavery & Human Trafficking Policy outlines our commitment to transparency, due diligence, and ethical conduct. This policy:

- Applies to all employees, contractors, and suppliers.
- Mandates compliance with applicable laws and standards.
- Requires immediate reporting of suspected breaches.
- Prohibits retaliation against whistleblowers.

Responsibility for implementation rests with the CEO and operational oversight is conducted by the UK Managing Director, who ensures compliance and monitors effectiveness.

Due Diligence, Risk Assessment and Management

To identify and mitigate risks, we:

- Conduct pre-qualification checks and risk assessments for new suppliers, including factors such as geography, industry, and type of labour involved to identify areas with a higher risk.
- Include anti-slavery clauses in all sub-contracts.



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		Date	24.07.2025
		Page	2 of 2
	DW-IMS-POL-017		

- Require supply chain partners to adopt equivalent policies.
- Maintain clear reporting channels for concerns.

Training and Awareness

Deepwave provides its employees with compliance training covering the Act and all employees within the Deepwave group are expected to comply with all laws and act in accordance with appropriate guidelines and regulations. New employees receive training as part of the induction process to ensure that they understand the policies and procedures Deepwave has in place to ensure compliance with these regulations. Staff involved in the procurement and project management processes receive additional guidance on how to:

- Recognise signs of modern slavery and human trafficking in our supply chain.
- Understand due diligence procedures.
- Report concerns responsibly.

Effectiveness and KPIs

To assess the effectiveness of our efforts, we monitor:

- Reports or incidents of modern slavery (zero in 2024).
- Supplier compliance rates.
- Staff training completion rates.

Looking Ahead

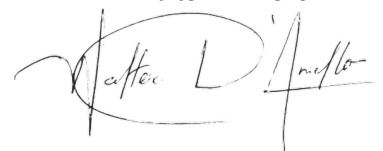
In 2025, we will:

- Expand our employee compliance training programme.
- Extend supply chain mapping to newly added regions.
- Enhance our supplier audit process.
- Review the implementation of a whistleblowing process.

This statement has been approved by the Board of Directors and signed on their behalf by:

Date: 24.07.2025

Chief Executive Officer
Walter D'Aniello




Deepwave

