MODERN SLAVERY & HUMAN TRAFFICKING POLICY

1. Policy Statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Martek Marine Ltd have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and our standard contract terms include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. We expect that our suppliers will hold their own suppliers to the same high standards.

1.3 This policy applies to all persons working for us or on our behalf in any capacity, at all levels and grades, including directors, officers, senior managers, employees (whether permanent, fixed-term or temporary), agency workers, seconded workers, homeworkers, casual workers, sponsors, trainees, agents, contractors, external consultants, third-party representatives and business partners, or any other person associated with us or any of our subsidiaries or their employees wherever located (referred to as “workers” in this policy).

2. Responsibility for the Policy

2.1 The Martek Marine Ltd board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

2.2 The Managing Director has primary responsibility for implementing this policy and monitoring its use and effectiveness across company operations. Each department head will have the primary and day to day responsibility within their respective area of business operation for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, maintaining all required records, and identifying and reporting any incidents which may contravene the Statements outline therein to the Managing Director.

2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given training as appropriate.

2.4 Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

3. Compliance

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur or if you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you should raise this with the Managing Director. Concerns may also be reported by following the procedure set out in the

Whistle Blowing Policy. A copy of the Whistle Blowing Policy can be obtained from the central online Handbook and Policies folder.

3.4 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Managing Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Policy and Procedure, which can be found in our central online Handbook and Policies folder.

4. Communication

4.1 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

5. Breach of the Policy

5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

5.3 This policy does not form part of any employee's contract of employment, and we may amend it at any time.

6. Training

6.1 We make training available to our staff on an on-going basis to ensure their understanding of the risks of modern slavery and human trafficking in our businesses and supply chains.