

MODERN SLAVERY STATEMENT

ABOUT OSM THOME AUSTRALIA

OSM Australia PTY LTD (ACN: 165 549 879) (referred to in this Statement as “OSM Australia” or “the Company”) is an Australian proprietary limited company and a subsidiary of the OSM Global Group of Companies. OSM provides ship management, crewing, technical management and marine workforce services to the offshore oil and gas, subsea and marine industries.

OSM operates within the Oceania region and forms part of the global OSM Thome Group. This Modern Slavery Statement is a single-entity statement made on behalf of OSM Australia Pty Ltd and any Australian subsidiaries it owns or controls during the reporting period. It is not a group statement made on behalf of the OSM Global Group.

OSM Australia meets the reporting threshold under section 5 of the *Modern Slavery Act 2018 (Cth)*, having consolidated annual revenue exceeding AUD 100 million during the reporting period. Accordingly, OSM Australia is a reporting entity for the purposes of the Act.

OSM's workforce comprises permanent employees, fixed-term employees, and contracted seafarers engaged under Australian enterprise agreements and maritime employment contracts.

OSM's management of modern slavery risk is governed by its:

- [Corporate Social Responsibility & Sustainability Commitment \(POL-01.06 – Global\)](#)
- OSM's [Code of Conduct \(Global\)](#)
- Modern Slavery Statement (this document)
- HR and recruitment procedures
- Procurement and subcontractor management controls

OSM's operations are conducted in accordance with:

- The Maritime Labour Convention 2006 (MLC)
- Australian workplace legislation
- Fair Work Commission-approved enterprise agreements
- Flag State requirements where applicable

A significant proportion of OSM's operations occur within Australia's offshore jurisdiction. Crew working on Australian vessels are either Australian nationals or hold full Australian working rights in accordance with Australian labour law.

COMMITMENT AND GUIDING PRINCIPLES

OSM Thome Oceania is committed to conducting business in a responsible, ethical, and sustainable manner that positively impacts all areas of our operations and the communities in which we work. This commitment reflects our core values – Responsible, Team Builders, Friendly, and Always On – and our obligations under the Modern Slavery Act 2018 (Cth).

OSM has zero tolerance for modern slavery in any form, including forced labour, debt bondage, human trafficking, child labour, coercion or exploitation. We are committed to upholding fundamental human rights and ensuring that all workers engaged within our operations and supply chains are treated with dignity, fairness and respect.

OSM reaffirms its commitment to the United Nations Global Compact Principles, including those relating to human rights, labour standards, anti-corruption and sustainability.

This Statement complements OSM's [Corporate Social Responsibility & Sustainability Commitment \(POL-01.06 – Global\)](#) and Code of Conduct, and applies equally to all employees, contractors, subcontractors, suppliers, and business partners across OSM Thome Oceania and its group of companies.

The Managing Director of OSM Australia retains ultimate accountability for compliance with the Act and oversight of modern slavery risk management within the Company.

GOVERNANCE AND DUE DILIGENCE FRAMEWORK

Responsibility for modern slavery risk management within OSM Australia rests with the Managing Director, with day-to-day oversight and coordination undertaken by the HSEQ Manager in collaboration with Human Resources, Procurement and Crewing functions. Modern slavery risk is integrated into OSM's broader governance, compliance and HSEQ management systems and is subject to periodic review as part of management review processes.

OSM maintains a structured governance framework to identify, assess and mitigate modern slavery risks within our operations and supply chains. This includes:

- Integrating modern slavery considerations into procurement processes, supplier onboarding and commercial contracting.
- Applying due diligence through established management systems and service-level agreements to prevent, detect, and respond to human rights risks.
- Ensuring subcontractors and suppliers demonstrate ethical and legally compliant labour practices, including fair wages, safe working conditions, and freedom from coercion or exploitation.
- Maintaining internal reporting mechanisms for concerns relating to unethical or unlawful labour practices.
- Assigning clear responsibilities across functions, including Procurement (supplier screening), Human Resources and Crewing (ethical recruitment and workforce compliance), and HSEQ (monitoring, reporting and assurance activities).

RISKS IDENTIFIED

OSM Australia recognises that modern slavery risks may arise within both its operations and its supply chains. The nature and level of risk varies depending on the type of service, location of operations, and the engagement model used.

OSM undertakes periodic assessments to identify areas where there may be an increased risk of modern slavery practices occurring within its business activities.

Crewing Risk

The maritime industry is globally recognised as a sector with inherent modern slavery risks due to factors such as:

- Cross-border recruitment and international labour mobility
- Engagement of migrant workers
- Complex contractual arrangements
- Remote offshore working environments
- Use of third-party recruitment or manning agents

OSM Australia engages both Australian and international seafarers in support of its vessel management and crewing operations.

The risk of modern slavery occurring within OSM's directly employed Australian workforce is assessed as low. Australian crew members are engaged under Fair Work Commission-approved enterprise agreements or compliant employment contracts, with wages paid directly to individual bank accounts and working conditions regulated under Australian workplace legislation.

Where international crew are engaged, there is an inherent industry risk associated with cross-border recruitment and labour mobility. However, OSM requires compliance with the Maritime Labour Convention 2006 (MLC), applicable Flag State requirements, and contractual wage and welfare standards, and directly engages all crew.

Taking these factors into account, the residual risk of modern slavery within OSM's directly managed workforce is assessed as low. Due to these controls, the residual risk within OSM's directly managed workforce is considered low.

Supply Chain Risk

OSM Australia maintains a supply chain that includes, but is not limited to:

- Training and certification providers
- Travel and logistics providers
- Catering and accommodation providers
- Uniform and personal protective equipment (PPE) suppliers
- Vessel subcontractors and specialist marine service providers

Modern slavery risks may arise within supply chains where services are labour-intensive, involve subcontracting arrangements, or operate in jurisdictions with differing regulatory standards.

In particular, the use of third-party subcontracted service providers, and suppliers operating in higher-risk jurisdictions may present an increased inherent risk of modern slavery practices occurring within upstream supply chains.

OSM considers the overall modern slavery risk within its supply chain to be moderate by sector classification but proportionate to its operational model, which is primarily workforce and service-based rather than manufacturing-focused.

MITIGATIONS AND ACTIONS TAKEN

OSM Australia has implemented a range of measures to assess and address modern slavery risks within its operations and supply chains. These measures are proportionate to the nature of OSM's workforce-based operating model and are integrated into existing governance, HR and procurement systems.

Maritime Labour Convention Compliance

OSM Australia has implemented a range of measures to assess and address modern slavery risks within its operations and supply chains. These measures are proportionate to the nature of OSM's workforce-based operating model and are integrated into existing governance, HR and procurement systems. MLC compliance includes:

- Minimum age requirements
- Regulated hours of work and rest
- Safe and hygienic accommodation standards
- Food and catering standards
- Access to medical care
- Repatriation rights
- Complaint procedures onboard vessels

MLC compliance materially reduces the risk of forced labour or exploitative conditions onboard managed vessels.

Governance and Internal Controls

OSM's governance framework includes key controls:

- Integration of modern slavery considerations into procurement and supplier onboarding
- Verification of right-to-work documentation
- Identity checks for all personnel
- Prohibition of recruitment fees
- Prohibition of document withholding
- Compliance with enterprise agreements and awards

- Internal reporting channels
- Whistleblower mechanism
- Maintenance of a Modern Slavery Risk Register to document identified risks, controls and mitigation actions across operations and supply chains.
- Integration of modern slavery considerations into internal audit programs and periodic management reviews to verify effectiveness of controls.

OSM maintains zero tolerance for forced labour, coercion, harassment or discrimination.

Modern slavery risk is embedded within OSM's broader HSEQ and governance systems rather than treated as a standalone compliance activity.

Supplier and Subcontractor Management

OSM utilises formal agreements with suppliers and subcontractors. These agreements require:

- Compliance with the Modern Slavery Act 2018 (Cth)
- Compliance with UN Global Compact labour principles
- Lawful employment practices
- Freedom from forced or child labour

Where new suppliers are engaged:

- Supplier due diligence is undertaken
- Risk category is assessed
- Contractual clauses addressing modern slavery are included

Where elevated risk is identified:

- Further due diligence may be undertaken
- Audit rights may be exercised
- Engagement may be terminated if concerns cannot be resolved

OSM does not engage unverified recruitment agents.

Supplier Due Diligence and Risk Assessment Process

- OSM applies a structured supplier screening and risk assessment process to identify and manage modern slavery risks within its supply chain. This includes:
- Pre-engagement screening through a Supplier Prequalification Questionnaire, including assessment of labour practices, workforce composition, and geographic exposure.
- Evaluation of suppliers based on defined risk criteria, including country risk, industry sector, use of subcontractors, and reliance on migrant labour.
- Assignment of a risk rating to each supplier.
- Implementation of enhanced due diligence measures for high-risk suppliers, including additional documentation, supplier declarations, and management approval before engagement.
- Periodic reassessment of suppliers based on risk level and contract duration.
- Maintenance of the OSM Supplier Risk Register to record screening outcomes, risk ratings, and monitoring activities.

REPORTING, GRIEVANCE AND ESCALATION PATHWAYS

OSM Australia encourages employees, contractors, subcontractors and other stakeholders to report any concerns relating to unethical labour practices or suspected modern slavery within its operations or supply chains.

Concerns may be raised through established reporting channels, including:

- HSEQ reporting systems

- Human Resources grievance processes
- OSM's confidential whistleblower mechanism

Reports may be made confidentially and, where permitted by law, anonymously. OSM prohibits retaliation against any individual who raises a concern in good faith.

All reported concerns are assessed and investigated in accordance with OSM's governance and compliance procedures. Where appropriate, matters are escalated to senior management for review and determination of corrective actions.

Where investigations identify potential breaches of law or serious misconduct, OSM will take appropriate remedial action and notify relevant authorities where legally required.

- Multiple reporting channels are available, including dedicated email, HSEQ reporting systems, and direct reporting to management.
- All reports are subject to an initial assessment within five (5) working days, with investigations conducted by HSEQ and/or Human Resources personnel.
- A defined escalation pathway is implemented, whereby significant matters are escalated to senior management, including the Managing Director, for review and decision-making.
- All reported concerns are recorded in a Grievance and Incident Register, including actions taken and close-out status.
- Corrective and preventive actions are implemented, tracked, and reviewed to ensure effective resolution.

TRAINING AND AWARENESS

OSM provides training and awareness programs to ensure personnel can identify and respond to modern slavery risks.

Training is provided to:

- Procurement personnel responsible for supplier engagement
- Human Resources and Crewing teams responsible for recruitment
- Managers and Supervisors involved in Operational oversight

Training includes:

- Identification of modern slavery indicators and risk factors
- Reporting obligations and grievance mechanisms
- Ethical sourcing and supplier engagement practices

Training is delivered at induction and through periodic refresher sessions.

Records of training completion are maintained within the Training Register and are subject to periodic review.

CONTINUOUS IMPROVEMENT AND TRANSPARENCY

OSM is committed to continuously improving its approach to identifying and managing modern slavery risks. OSM is committed to continuously improving its modern slavery risk-management processes through:

- Periodic review of this statement and associated policies.
- Strengthening supplier engagement and monitoring.
- Enhancing data collection and reporting to support OSM's mandatory Modern Slavery Statement under the Act (where applicable).
- Incorporating lessons learned, audit feedback, and industry best practice.
- Supplier audits and reviews

Findings arising from these reviews are recorded and, where necessary, corrective actions are implemented and tracked through OSM's management systems.

OSM periodically reviews its supplier engagement processes to ensure modern slavery considerations remain integrated into procurement and subcontractor management activities.

During the reporting period, no instances of modern slavery were identified within OSM Australia's operations.

This Statement is prepared annually and published in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

MONITORING AND KPIS

OSM monitors the effectiveness of its modern slavery risk management framework through defined performance indicators, including:

- Percentage of suppliers screened before engagement
- Number and proportion of high-risk suppliers subject to enhanced due diligence
- Number of reported grievances related to labour practices
- Completion rate of modern slavery training across relevant personnel

These indicators are reviewed periodically as part of management review processes and are used to drive continuous improvement.

MONITORING, ASSURANCE AND RECORDS

OSM maintains documented evidence to support its modern slavery risk management activities, including:

- Supplier Risk Register
- Training Register
- Incident Register
- Supplier prequalification and due diligence records

Modern slavery controls are subject to periodic internal audits and management review to verify compliance and effectiveness.

CONSULTATION WITH OWNED OR CONTROLLED ENTITIES

This Modern Slavery Statement has been developed in consultation with relevant functional areas within OSM Australia, including Human Resources, Crewing, Procurement, HSEQ and Operational leadership.

Consultation occurred through internal review and management processes to ensure that the risks, controls and mitigation measures described in this Statement accurately reflect OSM Australia's operations and supply chain activities.

This Statement is made on behalf of OSM Australia Pty Ltd and its Australian subsidiaries. Relevant policies and procedures relating to modern slavery risk management apply consistently across those entities.

APPROVAL

This Modern Slavery Statement has been approved by the Managing Director of OSM Thome Oceania in accordance with the Modern Slavery Act 2018 (Cth).



Renae Hesford

Head of Oceania
OSM Thome - Oceania