

## 1. Introduction

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 and outlines the measures taken by Maritime Asset Security and Training Ltd ("MAST") during the financial year ending 31 March 2026 to prevent modern slavery and human trafficking within our business operations and supply chains.

MAST is committed to operating ethically and with integrity in all our business dealings. We recognise our responsibility to prevent any form of slavery, servitude, forced or compulsory labour, and human trafficking. All employees and partners are expected to remain vigilant and report any concerns, regardless of how minor they may appear. Senior management will investigate and respond promptly and thoroughly.

## 2. Organisational Structure and Supply Chains

MAST is a global provider of risk management and security services. Our operations encompass:

- UK mangarding and associated security services in the UK
- Overseas consultancy support to the shipping industry and wider industries.

We currently operate in the following countries:

- United Kingdom
- Globally but only on an advisory basis deploying to support clients but not employing or buying direct services overseas.

We assess the risk of modern slavery by evaluating factors such as industry practices, geographic location, historical issues, and supply chain complexity. High-risk regions or suppliers are subject to enhanced due diligence and monitoring.

#### MAST SECURITY LTD

1 St Andrew's Hill, London, EC4V 5BY Company Registration No: 5428135

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## 3. High-Risk Activities

The following activities are considered to be at high risk of modern slavery or human trafficking: Overseas engagement of support services particularly in Nigeria.

The responsibility for implementing our anti-slavery and human trafficking measures is allocated as follows:

- **Policy Development:** Phillip Cable LLM as Director of the Company oversees policy creation and annual reviews. Policies are benchmarked against industry standards and tailored to our operational needs.
- **Risk Assessments:** Abbie Maynard, HR Assistant, Erika Finch Maritime Director and Adam Usher, UK Security Director are responsible for risk assessments in respect of human rights and modern by a process of quarterly audits
- **Due Diligence:** Claire Leenard, Finance Director carries out due diligence for new and existing suppliers, in relation to known or suspected instances of modern slavery and human trafficking.
- **Training & Awareness:** The Human Resources (HR) department is responsible for the development, implementation, and continuous improvement of training and awareness initiatives.

# 5. Training

To promote awareness and build capability across the organisation, MAST requires all management and supervisors to complete an online training course on modern slavery and human trafficking by August 2025. The training offers practical guidance on recognising indicators of modern slavery, understanding reporting protocols, ensuring compliance with the Modern Slavery Act, and identifying risks within the supply chain.

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# 6. Policies Supporting Our Commitment

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- Whistleblowing Policy: Maritime Asset Security and Training Ltd (MAST) maintains a robust and confidential whistleblowing framework designed to empower all employees, contractors, customers, and business partners to raise concerns regarding unethical, illegal, or unsafe practices within the organisation or its supply chains.
- **Code of Conduct:** the Code of Conduct outlines the ethical standards, principles, and professional behaviours expected of all employees, contractors, and representatives of Maritime Asset Security and Training Ltd (MAST) when conducting business on behalf of the Company.
- **Corporate Social Responsibility (CSR) Policy:** the Company's Corporate Social Responsibility (CSR) policy serves as a guiding framework for how we manage our environmental footprint, uphold human rights, and engage constructively with suppliers, clients, employees, and the wider communities in which we operate.
- **Anti-Slavery Policy:** the Company has an anti-slavery policy to uphold human rights and ethical standards, which includes prohibiting child labour, ensuring compliance with local and national laws, safeguarding freedom of movement, and guaranteeing access to remedy, compensation, and justice for victims of modern slavery.

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# 7. Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company's due diligence process includes the appointment of and attention of the following staff:

- **Compliance Officer** (or designated manager): Oversees implementation and monitoring.
- **Procurement & HR Teams**: Ensure supplier and recruitment practices align with this procedure.
- All Staff: Report concerns via appropriate channels.

Procedures include:

# 7.1 Risk Assessment

- Conduct annual risk assessments of supply chains and business partners based on geography, sector, and type of goods/services.
- Prioritise high-risk areas for further due diligence.

# 7.2 Supplier Due Diligence

- Require all new suppliers to complete a modern slavery self-assessment questionnaire.
- Include anti-slavery clauses in supplier contracts.
- Reserve the right to audit or request evidence of compliance (e.g. policies, training records).

## 7.3 Employment Practices

- Ensure all recruitment is direct or via reputable agencies.
- Verify worker rights, wages, and working conditions comply with UK law.
- Prohibit withholding of passports or payment of recruitment fees by workers.

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## 7.4 Training and Awareness

- Provide annual training for relevant staff on identifying and responding to modern slavery risks.
- Raise awareness among employees of signs of trafficking and reporting channels.

## 7.5 Reporting and Remediation

- Establish confidential reporting mechanisms for concerns.
- Investigate all reports and take remedial action, including termination of contracts if needed.

## 7.6 Record-Keeping and Review

- Maintain records of due diligence activities.
- Review this procedure annually and update as require

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Board of Directors endorse this policy statement and are fully committed to its implementation.

Approved by: Name: Phillip Cable Position CEO Date: 23<sup>rd</sup> June 2025

Signature:

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