



UK Modern Slavery Act Statement

June 2026

Document Owner	General Counsel and Company Secretary
Document Approver	Venterra Group Limited - Board of Directors
Date of Approval	June 2026

This statement by the Board of Directors of Venterra Group Limited is made pursuant to Section 54 of the Modern Slavery Act 2015. It outlines the steps the Venterra Group has taken during the financial year ending 31 December 2025 to prevent modern slavery and human trafficking in our businesses and supply chain.

Our Commitment

At Venterra Group, we are committed to conducting our business ethically, responsibly, and transparently. We recognize the serious global issue of modern slavery and human trafficking and are dedicated to ensuring that these crimes have no place in our organisation or supply chains. We continue to strengthen our efforts to mitigate modern slavery risks and support the protection of human rights across all our operations.

Our Business and Structure

Venterra Group exists to help the world’s energy transition through wind power. Our vision is to become a global services champion, enabling wind energy to lead the energy transition. We pursue this by acquiring and integrating experienced service providers in the offshore wind industry - our “Member Companies” - to create a collaborative, industry-leading group that supports the engineering, build and support phases of the lifecycle of offshore wind farms.

This statement applies to Venterra Group Limited and all subsidiary undertakings over which it has operational control, as listed in Appendix 1.

At Group level, we define how our businesses are expected to operate through our compliance framework and subsidiary governance framework. At the heart of these frameworks is our Code of Ethics and Conduct, which articulates our values, our standard for ethical conduct, our zero-tolerance approach to modern slavery and human trafficking, and the responsibilities of everyone working with or on behalf of Venterra Group.

Each Member Company is required to conform to these frameworks and operate in a way that upholds our shared standards. As our Group evolves, we continue to embed sustainable governance practices across both Venterra and our Member Companies, ensuring accountability and ethical behaviour throughout our operations and supply chain.

Policies and Governance

The Partner Code was published in late 2024 and during 2025, the Group started phased implementation across its companies, recognising differing levels of compliance maturity. This initiative reflects our commitment to continuous improvement and establishes clearer, more consistent expectations for our suppliers and business partners. Implementation of the Partner Code of Conduct is ongoing across our Member Companies, supporting alignment and practical application throughout the Group.

The Partner Code of Conduct sets out the standards expected of suppliers and business partners in areas including ethical conduct, modern slavery, and compliance with applicable laws. It also requires partners to establish and maintain appropriate systems and controls to identify, prevent, and address risks of modern slavery and human trafficking within their own operations and supply chains.

Reference:	VG-LEG-STA-001	Approved By:	Venterra Group Limited Board of Directors
Version:	5	Issue Date:	09 June 2026

Due Diligence and Risk Assessment

We have embedded modern slavery risk considerations into our third-party due diligence and broader compliance processes. We take a risk-based approach to modern slavery due diligence, ensuring that resources are focused on the areas of highest risk within our operations and supply chain. This approach is integrated into our compliance framework and includes the following steps:

- Conducting an **annual risk assessment** as part of our Group-wide compliance framework, which helps evaluate modern slavery risks across our operations and supply chains.
- Incorporating **modern slavery risk assessments** into supplier and contractor onboarding.

Through this risk-based approach, we focus on continuously identifying and mitigating potential risks related to modern slavery, ensuring that we can remain vigilant and responsive to emerging challenges.

Training and Awareness

We continue to ensure that new joiners are trained on modern slavery risks. This training is designed to raise awareness, build capability to identify warning signs, and reinforce reporting channels. It is mandatory for key personnel and reviewed for relevance on a yearly basis.

All staff within the group are required to read and attest to our Code of Ethics and Conduct and Whistleblowing Policy upon joining. Furthermore, all employees are required to do the same whenever major updates are made to these documents. Induction training is provided to all new members of staff in relation to our Anti-Bribery and Corruption policy.

Reporting and Victim Support

We are committed to creating safe, accessible, and confidential reporting mechanisms for anyone who may witness or experience unethical or unlawful conduct, including potential modern slavery or human rights abuses.

Our **whistleblowing hotline** is available not only to our employees but also to third parties, including suppliers, contractors, and business partners. This should help enhance transparency and accountability across our value chain and reinforce our zero-tolerance approach to modern slavery and human trafficking.

Our **employees have a responsibility to speak up** if they are aware of or suspect any form of human rights abuse in our business or those of our partners and they are empowered to do so. Under our Whistleblowing Policy, employees and others connected to Ventera Group (such as shareholders, suppliers, and contractors) are encouraged to raise concerns through multiple channels: their line manager, another manager, the HR or Legal and Compliance teams, or via our external whistleblowing services. This service allows for secure and anonymous reporting, ensuring individuals can raise issues without fear.

We do **not tolerate retaliation or victimisation** against anyone who reports a concern in good faith, including potential breaches of our Code of Ethics and Conduct relating to slavery or human trafficking.

We have published a **Victim Support helpline** on our intranet, providing a direct resource for anyone needing access to independent support or assistance.

Effectiveness and Next Steps

Oversight of these measures is provided through the Group compliance framework and periodic reporting to senior management.

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We are not aware of any evidence of modern slavery, forced labour, or human trafficking in our operations or supply chain from the time Ventera Group was formed in 2021 through to the date of this statement.

Looking ahead, we will focus on the continued integration and embedding of our policies, Partner Code of Conduct, and related procedures across our Member Companies, with the aim of supporting consistent implementation and alignment throughout the Group. Continuous improvement remains at the core of our approach to human rights and ethical business.

This statement constitutes the modern slavery and human trafficking statement of Ventera Group Limited and its subsidiaries for the financial year ended 31 December 2025. It has been approved by the Board of Directors.



Ayman Asfari

Chairman & Founder

June 2026

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Appendix 1

Subsidiary Undertakings / Member Companies	
APE Holland B.V.	Cape Holland Pte. Ltd.
Cape Holding I B.V.	Venterra Group Limited
Cape Holland Holding B.V.	Venterra Limited
Cape Holland Inc.	Venterra France SAS
Construction and Piling Equipment Holland B.V.	Osbit B.V.
Hillcon Piling Equipment B.V.	Osbit Inc
Inspire Environmental, Inc.	Osbit Limited
FoundOcean B.V.	Balltec Limited
Foundocean Holdings Limited	Partrac Geomarine, Inc.
Foundocean Limited	Partrac Limited
FoundOcean, Inc	Naver Energy ApS
Gavin and Doherty Geosolutions (UK) Limited	Ordtek Germany GmbH
Gavin and Doherty Geosolutions Inc.	Venterra APAC Limited
Gavin and Doherty Geosolutions Limited	Venterra Australia Pty Ltd
Ordtek Ltd	Venterra Denmark ApS
Geoforce Technical Services Limited	Venterra Germany GmbH
Hydrographic Personnel Resources (UK) Limited	Venterra Inc.
Oceanscan Holdings Limited	Venterra Korea Limited
Oceanscan Limited	Venterra Netherlands B.V.
Oceanscan, Inc.	Venterra Japan G.K.
Oceanscan Pte. Ltd.	Venterra APAC Limited, Taiwan Branch
Sercal Non Destructive Test Equipment Limited	

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