

MODERN SLAVERY & HUMAN TRAFFICKING

STATEMENT 2025/26



THE NATIONAL OCEANOGRAPHY CENTRE

Our planet is a blue planet. Most of its expanse is covered by the ocean. This vast space is the lifeblood of our world yet so much of the ocean is yet to be discovered and its value is so often overlooked and misunderstood.

The purpose of the National Oceanography Centre (NOC) is to gain a deeper knowledge of the ocean to address major challenges facing society and the natural world. We are uniquely placed, working with partners from around the world, to turn research and technological innovation into trusted knowledge for real action and solutions.

In 2025 we took an exciting step to further achieve our charitable objectives and launched a new 10-year strategy. This strategy outlines our vision and directs how NOC will impact the world's oceans for the benefit of all life on Earth. Four major outcomes are detailed within the strategy that will support NOC's ambitions and help us to continue to deliver world-class research and innovation.

1. Deeper Knowledge of the Ocean: We develop the capacity, for ourselves and for others, to deliver world-leading science that spans the spectrum from curiosity-driven to applied.
2. Value for Society: We must ensure that the knowledge gained is used to the benefit of society and planetary health.
3. A Vibrant and Healthy Organisation: We expect excellence in our science and impact activities, which is only possible if we are a vibrant and healthy organisation.
4. A Financially Resilient Organisation: To ensure we are robust to changes in the funding landscape, and to maximise the potential for our organisation, we must have a financially resilient organisation.





HOW NOC MANAGES GOVERNANCE

Governance is managed by the Executive team whilst the Board of Trustees maintain oversight and accountability. Executive and the Board are supported by various committees, advisory panels and working groups to ensure risk, ethics, and operational matters are given adequate oversight and ensures decisions are made at appropriate levels.

The Board and each Committee have written Terms of Reference which outline specific responsibilities and reporting lines. NOC also has a comprehensive organisational diagram which is updated routinely and a Schedule of Delegated Authority which is updated at least annually, both of which provide clear structure for organisational decisions.

NOC provides an all-inclusive set of documents to guide staff on legal requirements, regulations, and the organisation's strategy. People policies include the Contracts of Employment, which address human rights and trade union access, and the Flexibility Policy, which supports flexible working arrangements. The Overtime Policy covers exceptional circumstances, while the Equality, Diversity & Inclusion Policy emphasises fair treatment and anti-discrimination. The Grievance Policy prohibits inappropriate behaviour, and the Seafarers Agreement aligns with the Maritime Labour Convention 2006. Procurement policies, such as the Supplier Code of Conduct, comply with the Modern Slavery Act 2015, ensuring robust terms and audit trails. Legal policies include Anti-Slavery & Human Trafficking, Complaints, Safeguarding, and Whistleblowing, providing protection and reporting mechanisms for staff and visitors.

STAFF AT NOC

NOC is proud to employ 700+ staff all of whom provide a vital contribution to NOC objectives. With a mix of scientists, technicians & engineers, mariners, and professional & support staff, NOC benefits from a wide range of expertise and experience.

Starting with the recruitment, NOC's strength in process ensures a focus on fairness, openness and responsibility. The recruitment process protects everyone's rights and freedoms, keeps personal data secure and provides support to all applicants from first contact to appointment. Our onboarding process includes robust due diligence to verify identity, and there are measures in place that will recognise identity fraud. Staff recruited from outside of the UK will require additional processes and identity verification that satisfy UK VISA requirements and further ensure NOC are not employing anyone that is a victim to trafficking crimes.

During the 2024/25 financial year NOC recruited ~100 new staff with around 10% requiring a VISA to work within the UK. In addition to multiple successful recruitment campaigns, NOC used two recruitment agents during the year, both of which were subject to relevant due diligence checks and contractual terms. In some cases, relocation packages are offered to new staff which support the cost of moving and are only repayable when leaving NOC's paid employment within 3 years.

Following an update in law related to the prevention of sexual exploitation and abuse in April 2025, relevant policies are being created, and staff training is being planned. The policy and training will seek to raise awareness of what this law means for staff, what inappropriate behaviour looks like and how this can be deemed exploitative, help staff understand their individual rights, where and how they may seek support, and how NOC implements prevention measures and responds to incidents.

SHIPS AT NOC

NOC manages two Research Vessels, the RRS James Cook and the RRS Discovery. These ships are used to conduct scientific research across the globe and are integral to the delivery of NOC objectives. Both vessels are staffed with crew members, including officers and technicians responsible for operational management, as well as scientists and additional technical personnel dedicated to conducting scientific research. All personnel on board either research vessel have their rights protected in line with the Maritime Labour Convention 2006 (MLC). This comprehensive set of rules ensures seafarers receive fair wages, paid annual leave, repatriation, safe and decent accommodation, regulated working hours and breaks and access to complaint mechanisms.

NOC policies include dedicated marine documents outlining how MLC requirements are met. This provision of documents includes how seafarers must follow the Maritime Coastguard Authority's (MCA) Hours of Rest regime for UK flagged vessels and the compliance with minimum rest hours in any rolling 24-hour and 7-day period. The Schedule of Duties, detailing work and rest periods, is posted on board, and seafarers are instructed to accurately record their rest hours for future scrutiny. These policies, working practices and controls are routinely audited both via an internal provision and externally by the MCA. Actions for improvements are remedied appropriately and under the supervision of senior staff at NOC.

Both research vessels travel across the globe and dock at ports of countries that do not have equivalent Modern Slavery prevention

laws. As a UK organisation, NOC continues to implement the requirements of the Modern Slavery Act 2015. NOC will only work with port agents registered with the Lloyds list of shipping agents because due diligence is conducted to ensure legal and regulatory compliance, including adhering to anti-slavery and human trafficking laws that are in place.

To align with recent publications related to smuggling within the maritime industry, NOC intend to deliver awareness campaigns related to the risks of smuggling and how proper export and import controls must be followed. Additionally, how the illegal wildlife trade and byproducts of this trade, could inadvertently be smuggled via souvenirs or other purchases made in countries around the world.

PROCUREMENT AT NOC

The procurement of goods and services continues to be an area of risk under continuous monitoring. Processes are monitored routinely and updated to meet new legal requirements and best practice. NOC recognises this as an ongoing risk and is keen to constantly improve and meet best practices.

NOC's dedicated team have been working hard to implement all that is needed to meet the new Procurement Act 2023 and are continuing to strengthen processes and controls. NOC works with just over 1,400 suppliers to meet the varied needs of the business and 80% of these are based in the UK. Close to a third of suppliers have signed NOC's supplier Code of Conduct and the team continue to work with the remainder to ensure NOC can be satisfied that Modern Slavery links are mitigated against and our values are being met.

NOC continues to commit to fair payment terms and has a policy to pay all suppliers within 30 days. By making this commitment, NOC supports its supply chain and contributes to the prevention of adding unreasonable pressure to suppliers that could otherwise be exposed to unfair financial strain.

TRAINING AT NOC

Staff development and training is a key function at NOC, and which starts from day one of employment. New starters are provided with multiple inductions on key areas including Modern Slavery, staff benefits and support systems, and health & safety.

We additionally provide annual training on important compliance areas including how to meet Modern Slavery laws and we deliver campaigns that raise awareness on the signs of Modern Slavery and how to report suspicions.

OUR 2024/25 ACHIEVEMENTS

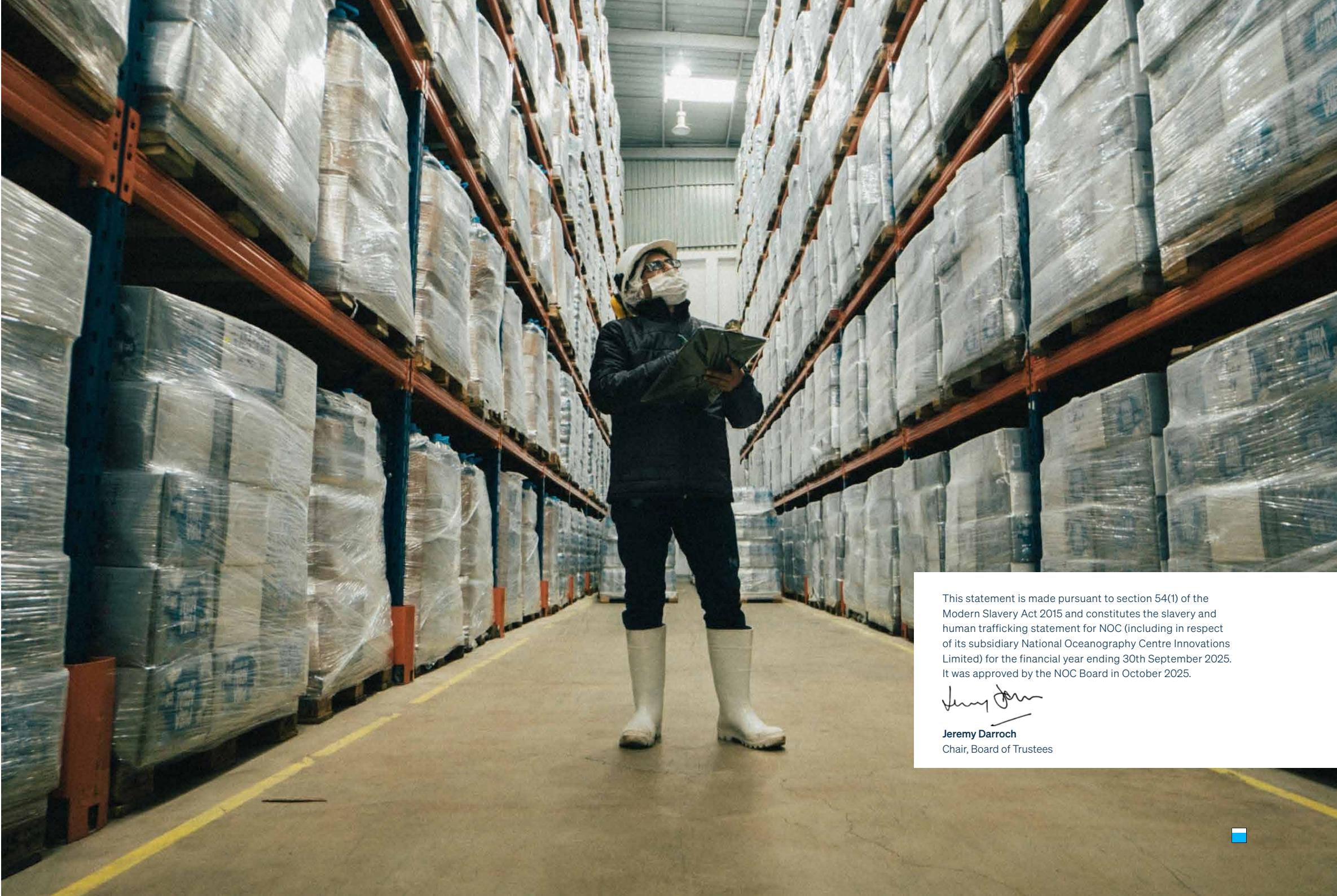
During the 2024/25 financial year, NOC achieved the following:

- Materials were produced to engage with and increase awareness of our Modern Slavery commitments. These were shared with our NOC-Innovation Centre Members, our supply-chain, and our PhD Students. The intention of this activity was to show how NOC remains committed to achieving excellence without compromise and will do all that is possible to eradicate the risk of Modern Slavery links in all business activities.
- The dedicated NOC Procurement Team continue to implement a strategy in which all existing and new suppliers will meet the NOC Code of Conduct. As such, NOC expects all suppliers to adhere to the UK’s Modern Slavery law. This includes making reports to NOC should any links to Modern Slavery crimes be identified.
- A review was conducted of current practices based on the Governments Modern Slavery Assessment Tool. The information has been used to provide a basis for improvement and continues to be a source of information for best practice.
- This year’s Modern Slavery awareness campaign included posters displayed on our 2 research vessels and an address to the organisation via one of the monthly Open Staff Meetings. Both intended to raise awareness by presenting a key summary of what this law means for the organisation and how we can all contribute to ensuring its successful achievement.

OUR 2025/26 COMMITMENTS

During the 2025/26 financial year, NOC aims to commit to the following:

- Update our Modern Slavery Policy to include how we prevent instances of smuggling via our Research Vessels.
- Provide specific training on anti-smuggling and how NOC staff can support this moving forward.
- Deliver updated policy and subsequent training related to the new Prevention of Sexual Exploitation and Abuse law.
- Progress measures within our procurement process to meet best practice in the prevention of Modern Slavery.



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for NOC (including in respect of its subsidiary National Oceanography Centre Innovations Limited) for the financial year ending 30th September 2025. It was approved by the NOC Board in October 2025.

Jeremy Darroch
Chair, Board of Trustees

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