

# NSMP Slavery and Human Trafficking Statement for Financial Year 2024

## 1. Introduction

Selkie Investments Midstream Topco Limited (“Selkie Topco”) is the parent and ultimate holding company of the NSMP group (“NSMP”). This statement applies to the following subsidiaries of Selkie Topco:

- Selkie Investments Midstream Bidco Limited
- NSMP Operations Limited
- Teesside Gas & Liquids Processing

This is NSMP’s fifth Modern Slavery Statement, prepared in accordance with the UK Modern Slavery Act 2015. It outlines the steps we took during 2024 to enhance the controls we have in place to identify and prevent the risks of modern slavery across both our direct operations and wider supply chain.

## 2. Our Commitment

Our Core Values are:

- (a) Do the Right Thing: This means making decisions with integrity, honesty and transparency;
- (b) Care and Respect: This means acting with open-mindedness and consideration towards our colleagues and stakeholders; and
- (c) Strive to Deliver: This means working towards win-win, long-term solutions for our business and society

A key aspect of NSMP’s Core Values is ensuring that the business and all personnel comply with applicable anti-slavery laws. We adopt a zero-tolerance approach to modern slavery, and our Code of Conduct explicitly affirms our commitment to preventing human trafficking and modern slavery across our operations and supply chains.

Responsibility for identifying, assessing, and responding to modern slavery risks lies with our Leadership Team, which has taken proactive steps to address and mitigate these risks. We are committed to continuously improving our understanding and management of modern slavery risks within the business. This statement outlines the actions taken during the 2024 financial year to identify potential modern slavery risks and to implement measures aimed at preventing slavery and human trafficking throughout our operations and supply chain.

## 3. Our business and supply chains

NSMP comprises 16 group companies operating across the UK and Norway. In the UK, we provide gas transportation and processing services to the oil and gas industry in the North Sea, while in Norway, we offer gas liquefaction services.

We are supported by a network of over 300 suppliers located across Europe that we contract with directly or through px Group Limited (“px”), our operating partner. Our relationships with suppliers are built on trust, integrity, and mutual benefit. As part of the Operations, Maintenance and Management arrangements, px acts as our agent in relation to many of our supply chain agreements.

## NSMP Slavery and Human Trafficking Statement for Financial Year 2024

The majority of our suppliers are engaged by px and we have a small number of direct suppliers primarily for professional services. The services provided by suppliers engaged through px include support functions such as security, logistics, catering, cleaning, and waste management as well as specialist technical services, including engineering and mechanical services. In some cases, these suppliers engage subcontractors to deliver services on their behalf.

### 4. Risk Assessments and Due Diligence

As part of our commitment to continuous improvement in our supply chain practices, we introduced a Direct Business Partner procurement arrangement in 2024. This framework includes a robust onboarding and screening process, the incorporation of compliance provisions into contractual terms, and ongoing monitoring of supplier performance.

Similarly, px undertakes initial due diligence on all new suppliers, which includes comprehensive onboarding checks covering health, safety, and environmental standards, labour relations, and employment practices. Suppliers are also required to attest to their compliance with the provisions of the Modern Slavery Act 2015.

Once a contract is in place, ongoing monitoring is conducted through risk assessments and supplier audits. These risk assessments consider the nature of the services provided, the presence of vulnerable demographic groups, and the jurisdictions and sectors in which we operate.

px has also implemented IT monitoring tools to support supplier audits, enhance supply chain visibility, and promote compliance with relevant standards. While no supplier audits were conducted during 2024, a number of audits are planned for 2025. We maintain regular communication with px and receive ongoing feedback regarding procurement activities across our operations.

To date, we are not aware of, nor have we been informed of, any allegations of human trafficking or modern slavery involving any of our suppliers. Should such an issue arise we will take immediate and appropriate action against the supplier and report it to the authorities.

### 5. Policies

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or any part of our business.

Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our supply chains.

In addition, we have the following policies in place that support our commitment to preventing modern slavery:

- **Code of Conduct** – Connects our core values with the behaviours and practices we expect from our employees, suppliers, and all those impacted by our business activities.
- **Whistleblowing Policy** – Encourages employees, suppliers, and other stakeholders to report any suspicions of slavery or human trafficking without fear of retaliation. A confidential helpline is available to protect the identity of whistleblowers.

## NSMP Slavery and Human Trafficking Statement for Financial Year 2024

- **Direct Business Partner Procurement Policy** – Establishes a clear framework for engaging and contracting with third parties, ensuring alignment with our ethical standards and compliance expectations.


All policies are subject to regular review and updates. In 2024, we undertook a comprehensive review to ensure alignment with our current values, updated organizational structure, and improved mechanisms for raising concerns.

### 6. Training

During 2024, all employees completed mandatory training on our Code of Conduct via an e-learning module. The training outlines our minimum expectations for ethical behaviour by anyone we work with or alongside and reinforces our commitment to doing the right thing and acting with integrity. The module includes an assessment, with a required pass mark of 80%.

In 2025, all employees will be required to complete mandatory training on Modern Slavery which will be delivered through e-learning. It will focus specifically on key risks, warning signs, and our reporting procedures.

**This statement covers 01 January 2024 to 31 December 2024 and has been approved by the board of Selkie Investments Midstream Topco Limited and each of its relevant subsidiaries on 17 June 2025 in compliance with the Modern Slavery Act 2015**

Signed by:  
  
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**Angela Fletcher**

**CEO**

**18 June 2025**