MODERN SLAVERY

STATEMENT 2026/27

National Oceanography Centre



THE NATIONAL OCEANOGRAPHY CENTRE

The National Oceanography Centre (NOC) works to deepen our understanding of the ocean through world-class science, technology and data, helping society respond to global challenges such as climate change, biodiversity loss and rising sea levels.

As a charity, NOC delivers research, innovation and national capability for the public good. Alongside this, NOC Innovations - its commercial arm - works with organisations worldwide to apply the same expertise through consultancy, research and advanced technologies. Together, they turn ocean knowledge into practical solutions that support a healthier ocean and a sustainable, resilient marine economy.

Our ten-year strategy sets out a bold vision to take NOC even further as a leading global centre for ocean science and innovation. It focuses on growing our impact, strengthening partnerships, and ensuring our science and technology help tackle the world's most pressing ocean challenges.

At its heart, the strategy is about delivering world class science that is purposeful, accessible and creates real value for society and planetary health. It is underpinned by four key outcomes:

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.

NOC has a zero-tolerance approach to modern slavery, human trafficking, forced labour or any other type of exploitation or breach of human rights. NOC is committed to the prevention of such practice and work to minimise this risk in all areas of business including supply chain links.

This statement covers the activities of both the National Oceanography Centre (NOC) and its wholly owned subsidiary, NOC Innovations (NOCI).



GOVERNANCE AT NOC

NOC 's Board of Trustees are accountable for governance arrangements at NOC. The operational elements of governance are delegated to the Executive Team and key personnel within the business however, Trustees maintain oversight via quarterly meetings and through the Board Committees. NOC has a number of strategic and operational committees and advisory groups, all tasked with key priorities and responsibilities.

Since the launch of NOC's ambitious 10-year plan in October 2025, changes have been made to committee groups to ensure that each priority has dedicated, and appropriate attention. Committee terms of reference have been updated to reflect these changes. The new Committee structure is robust, pragmatic and provides reliable oversight and decision-making processes for NOC to achieve objectives.

On a routine basis, NOC's governance arrangements require reviews of important documents that are in place to guide and direct staff. This includes an annual update to the Schedule of Delegated Authority, and regular reviews of all policy and procedure documents. NOC has in place a multi-year rolling schedule that directs reviews of all policies and procedures. Reviews are conducted collaboratively with responsible teams, subject matter experts, and with legal oversight. In addition, NOC has in place feedback mechanisms, incident reporting and horizon scanning activity that will trigger reviews of a policy or identify gaps so action can be taken outside of planned updates.

NOC's suite of policies and procedures intend to meet all legal and regulatory requirements, best practice and organisation strategies.

NOC has in place people policies that intend to meet all legal obligations, including those requirements of the Maritime Coastguard Agency, exemplify best practice and protect staff from exploitation, harm or unfair treatment. Our people policies address human rights, access to trade unions, flexible working and overtime provision, anti-discrimination and how to report unacceptable behaviour. Seafarers working from the NOC-managed research vessels are bound by the Maritime Labour Convention which is set out in their Seafarers Agreement. Procurement and purchasing policies include expectations for suppliers that meet the Modern Slavery Act 2015, and we have legal policies in place that direct how complaints can be made directly or via whistleblowing. During 2025/26, we updated our Modern Slavery Policy to strengthen the content and meet guidance received following interaction with the HM Governments Modern Slavery Assessment Tool.



MODERN SLAVERY RISKS

NOC has in place a risk management policy and procedure which intends to identify risk in all areas of the business including any modern slavery risks. Risks are discussed at all levels of the business with the most serious being escalated to the Executive Team. Dedicated individuals are in place to support risk management including the consistency in applying risk appetite which is decided by the Board.

NOC has identified its most prominent modern slavery risks relate to the onboarding of new staff, travelling internationally via the NOC-managed research vessels and the supply chain for goods and services. Each area of risk has been further described in this statement.

The risk management procedure, in addition to others, provides a route for staff to raise concerns and there are other routes in which non-staff can also do this.

STAFF AT NOC

NOC employs 774 staff and during 2025/26 90 new starters joined the organisation. Our recruitment process aims to meet best practice and fairness with open advertisements and transparent processes well established. Recruitment and staff onboarding at NOC starts well before a new-starters first day. Staff involved in hiring are required to complete recruitment training that covers standard processes, legal requirements and how to recognise and therefore reduce instances of unconscious bias.

Pre-employment checks are conducted which include standard previous employer reference checks, an occupational health assessment and DBS a check. A new starter will sign an employment contract which covers the protection of all human rights and will be subject to an identification check on their first day. Additionally, as an A-rated sponsor, NOC supports staff that require a VISA and where the role is eligible for sponsorship. Additional verification of right to work status is conducted as required. These checks are in place to achieve best practice process, meet legal requirements and protect both the new starter from potential exploitation and existing staff from any potential harm.

Staff are NOC's most valuable resource, and objectives could not be achieved without everyone's contribution. It is for this reason NOC takes so seriously the safety and security of premises and staff wellbeing. In adherence with updated law, NOC launched the Prevention of Sexual Harassment Policy and a mandatory online training session for all staff to complete. This training now features as part of the new starter induction process and as part of annual training for all staff. The policy outlines how NOC prevents sexual harassment and provides staff a mechanism for reporting such incidents. Supporting documents, such as the Whistleblowing Policy, have been updated to strengthen language and ensure there are multiple routes for making reports of unwanted or inappropriate behaviour.

To support the security of the NOC premises and when public events are held, NOC has published a new procedure which outlines how we meet the requirements of new laws intended to prevent security breaches at public events.

SHIPS AT NOC

NOC manages the operation of two research vessels, the RRS Discovery and the RRS James Cook. Ships are crewed by mariners and dedicated technical staff and managed in line with the Maritime Coastguard Agency requirements. This includes adherence to the Maritime Labour Convention 2006 which directs paying a fair wage and accrued leave, repatriation provision, providing safe and decent accommodation, regulating working hours and breaks and providing access to complaint mechanisms. To ensure that NOC is meeting these requirements and in addition to the current external and internal audits that take place, NOC will review how internal audit can scrutinise working hours and meeting minimum wage payments.

NOC is working on an update to an existing engagement campaign focussed on the expected behaviour of staff and visitors on ships. This will primarily be aimed at anyone boarding the ships, mariners, technicians and visiting scientists, but will also be available to shoreside staff. The update will consider how the prevention of sexual exploitation, abuse and harassment can be met and the mechanisms for reporting instances of this or other types of inappropriate behaviour. NOC recognises the reluctance to report some behaviours, so are working on increasing staff understanding of how this can be done anonymously in addition to understanding the legal protections that exist for those making a report.

In addition, NOC has in place two key mechanisms to support those travelling, not only aboard ships but on any business trip conducted. The travel insurance policy will cover anyone working on behalf of NOC and will support them when in need of assistance including when they require medical attention. The second mechanism is the use of a dedicated business travel partner which makes all travel arrangements. This approved supplier works closely with the Business Support team to meet all staff travel needs and has emergency protocols in place for in the event of a security incident where staff require emergency repatriation.

NOC also continues to have a focus on preventing risk related to the use of foreign ports as part of its global operations. To meet the requirements of the Modern Slavery Act 2015, NOC works with the Lloyds list of shipping agents because due diligence is conducted that tests compliance with all legal and regulatory compliance. Further, NOC has provided engagement to staff related to proper import and export requirements and reminders of possible links between Modern Slavery and the illegal wildlife trade and how souvenirs may contain illegal animal byproducts.

PROCUREMENT AT NOC

NOC procures goods and services in the region of £37m a year with almost 1500 registered suppliers. Supplier links continue to be NOC's highest risk area for links with Modern Slavery, and work continues to improve our processes and the mitigations we have in place.

NOC's procurement function is structured to separate purchasing activity (under £25k) from procurement activity (over £25k), giving clarity to staff and allowing a focused approach from two dedicated teams.

When onboarding suppliers, NOC carries out due diligence proportionate to contract value and risk. For suppliers under £25k, this includes a comprehensive onboarding check, confirmation of compliance with the NOC Supplier Handbook, and a financial and risk check via Creditsafe. For suppliers over £25k, NOC's full procurement due diligence process applies, and suppliers are engaged on NOC terms and conditions or those that are negotiated alongside our Supplier Code of Conduct. These terms and conditions set out the expectation to comply with the Modern Slavery Act 2015.

NOC has a number of existing, long-term suppliers retained for the specialist nature of the work they provide. Where NOC needs to work with a single supplier, a thorough justification and approval process is followed. NOC undertakes regular reviews of supplier risk profiles and are working to move as many suppliers as possible onto negotiated terms or NOC standard terms. All suppliers are reviewed on an ongoing basis via Creditsafe alerts, which flag any material change in a supplier's financial position or risk profile. In addition, where supplier concerns are raised, we have escalation processes in place to further identify risk and take appropriate action.

NOC follows the Government's Prompt Payment Code for public contracts, and is committed to paying suppliers within 30 days, reducing the risk of causing suppliers unreasonable financial pressure through late payment. NOC reports payment practices to Government on a 6-monthly basis through both the central digital platform and companies house reporting.

NOC continues to review how improvements in this high-risk area can be further strengthened. To support more proactive and preventative measures, NOC is reviewing how internal audit can assist with routine activity testing both supplier onboarding compliance and supplier adherence to Modern Slavery prevention and reporting requirements.

TRAINING AT NOC

Staff are NOC's greatest asset. The breadth and depth of expertise at NOC spans thousands of years and working together to achieve NOC objectives is an exciting place to be. NOC prides itself in supporting staff to evolve within a role and to progress across the organisation. A dedicated Learning & Development team is in place and there are budgets earmarked for delivery of continuing professional development.

In addition to bespoke and role or person specific training opportunities, NOC delivers routine training and engagement including mandatory requirements each year. The Health & Safety team deliver popular engagement events several times a year to highlight the importance of safety protocols and offers specific training for staff whose responsibilities may include heavy lifting, working at height or with chemicals, and for those travelling abroad to highlight potential high-risk scenarios.

Compliance with policy and procedure is also a feature of many training events at NOC. During 2025/26, we delivered training on being an Active Bystander, a training session that intended to give staff tools needed to report on or address unacceptable behaviour. We delivered an in-person event on fraud prevention, intended to protect NOC and raise awareness so staff would be less likely to fall victim of personal fraud attempts. We also delivered training on the Sexual Harassment Policy, providing information to staff on how to deal with instances of sexual harassment and informing them of processes in place to report unacceptable behaviour.

To enhance awareness of Modern Slavery risk at NOC, bespoke training was delivered to the leadership team and those with the ability to raise a requisition that highlighted the risks of Modern Slavery in our supply chain. This training intended to inform staff of their responsibilities and as a result of delivery, was expanded across the organisation as part of engagement with the business.





OUR 2025/26 ACHIEVEMENTS

During the 2025/26 financial year, NOC achieved the following:

- We updated our Modern Slavery Policy. The update included the prevention of smuggling via our Research Vessels, and incorporated feedback gained by using the HM Governments Modern Slavery Assessment Tool. These updates intend to deliver on best practice standards. We additionally updated our Recruitment Policy to strengthen language and provide clarity on how we prevent Modern Slavery risk whilst recruiting new staff.
- Training and engagement activity was delivered on how NOC processes support anti-smuggling and informing NOC staff of their responsibilities to support this compliance requirement. NOC additionally delivered specific training to leaders in the organisation and those staff who can raise requisitions. This training highlighted the high-risk of Modern Slavery links in our supply chain and how staff can support prevention. 87% of the staff asked, completed this training and it was made available to all staff via the NOC intranet.
- To comply with legislation, a new policy and training was delivered to staff related to the prevention of sexual harassment. This training was completed by 96% of staff and now forms part of all new starter inductions. NOC takes seriously the safety of its staff and has taken steps to incorporate legal requirements across all people processes. In addition to the dedicated policy, updates to existing documents also took place, including in the Whistleblowing Policy, Travel Policy, Safeguarding Policy and other guidance documents related to staff conduct.
- Extensive updates have taken place within the procurement service at NOC. Primarily to meet the updated procurement legislation. These updates support the prevention of Modern Slavery by ensuring dedicated individuals and clear controls are in place for onboarding and managing NOC suppliers.

OUR 2026/27 COMMITMENTS

During the 2026/27 financial year, NOC aims to commit to the following:

- NOC are keen to take next steps in proactive prevention of risk related to its supplier network, as such will review preventative measures including audit testing to identify supplier related risk.
- NOC will introduce periodic payroll assurance reviews to identify indicators of exploitation, verify compliance with wage-related obligations and strengthen oversight of employment practices.
- NOC is reviewing how we can enhance the protection of those working at sea. This includes a review of our engagement campaign related to behaviour, explicit links to the prevention or sexual exploitation, abuse and harassment and providing multiple mechanisms for making reports.
- NOC will continue to conduct horizon scanning activities to identify where changes are needed that meet legislation, regulation or best practice. As part of this activity, NOC will investigate how best we can improve identification of required changes including the extension of specific audit activity and training requirements.

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 2026. It was approved by the NOC Board in November 2026.

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Chair, Board of Trustees



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