



Statement on the prevention of modern slavery and human trafficking

Financial year ending December 31, 2022

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Javelin Global Commodities Holdings LLP and its subsidiaries ("Javelin") has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Javelin fully supports the aims of the Act and is committed to tackling slavery and human trafficking.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Javelin has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Javelin was founded in 2015 as a joint venture between strategic industry investors, and a management team consisting of industry leading marketing, trading and operations professionals. Javelin is now a leading multi commodity trading platform in the global markets and is committed to upholding strict ethical standards, including as to the protection of human rights.

Risk assessment

Javelin is an intermediary in the commodity supply chain. It is not directly involved in any extractive or industrial practices itself. None of its employees are at risk of slavery or human trafficking.

Over 85% of the commodities purchased by Javelin are sourced in the US, a low risk territory for slavery and human trafficking. Javelin's major suppliers in the US have a strict code of conduct to ensure best practice is followed.

Of our other commodities sourced outside of the US, such as Australia, we deal with established and reputable international suppliers who demonstrate a strong commitment to corporate social responsibility ("CSR"), including the publication of CSR reports.

Furthermore, all suppliers are expected to acknowledge Javelin's ethical standards and we routinely include contractual clauses to this effect.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Our Corporate Social Responsibility statement outlines the standard of ethical business conduct we expect from our supply chain. We expect all business in our supply chain to offer a safe workplace for their employees that is free from harm, intimidation, harassment and fear.



2. Appropriate due diligence is carried out on any new supplier before we start to work with them, a process which, among other things, helps to reduce modern slavery risk in our supply chain.
3. Javelin's own internal policies include a whistleblower procedure to enable concerned employees to raise concerns with appropriate senior personnel.

Training

We conduct training for our procurement team so that they understand the signs on modern slavery and what to do if they suspect that it is taking place within our supply chain.

We are committed to continually reviewing our policies and procedures to ensure that we are doing all that we can to operate free from enforced labour, human trafficking and slavery.

Javelin Global Commodities Holdings LLP

Date: March 2023

This statement has been approved by the Javelin Global Commodities Holding LLP board of directors and is made pursuant to the requirements of section 54, part 6 of the Modern Slavery Act 2015 for the financial year ending December 31, 2022. This statement applies to all subsidiaries of Javelin Global Commodities Holding LLP that are required to have a slavery and human trafficking statement.