Statement on the prevention of modern slavery and human trafficking
Financial Year 2025

1. Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "**Act**") and covers the financial year 1 January 2025 to 31 December 2025.

The statement outlines the steps Javelin Global Commodities Holdings LLP and its subsidiaries ("**Javelin**") have taken during the financial year to ensure that modern slavery and human trafficking are not taking place within our business or supply chain.

Javelin adopts a zero-tolerance approach to all forms of modern slavery. We support the objectives of the Act and are committed to conducting our business ethically and with integrity and transparency.

2. About Javelin

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

3. Risk Assessment

Our organisation is split between corporate activities and operational activities.

<u>Corporate Activities</u>

Javelin is primarily a trading and marketing business, with these activities being carried out from our corporate offices. Employees in these offices perform skilled work across trading, marketing, logistics, advisory, and corporate support functions, including finance, tax, legal, and human resources. These activities are professional in nature and rely minimally on temporary workers and contractors.

Given the low level of outsourced staffing, the professional office environments, the highly skilled nature of the work, and our strong internal operating standards, we consider the risk of modern slavery within our corporate operations to be low. Nevertheless, we remain alert to potential risks, particularly given the small number of lower-skilled outsourced roles, such as cleaning and maintenance services.

<u>Operational Activities</u>

Javelin has some limited exposure to the extractive industry through its ownership of Bluegrass Natural Resources (BNR). BNR is a coal producer located in Southeastern

Kentucky that operates underground mines. Javelin maintains close oversight of its BNR asset, where high standards of safety and employee welfare are observed. To date, no risks of modern slavery have been identified in connection with this asset.

Javelin sources the majority of the commodities it purchases from the United States, which is generally considered a lower-risk jurisdiction for modern slavery. Javelin's major suppliers in the US have strict codes of conduct to ensure best practices are followed. Other jurisdictions include the United Kingdom, Australia, Portugal, Colombia, Peru and Vietnam.

In jurisdictions with elevated modern slavery risks, Javelin seeks to work with established, reputable counterparties that demonstrate a commitment to responsible business practices and corporate social responsibility. To mitigate risk, Javelin's supplier onboarding and engagement processes consider counterparties' compliance frameworks, reputations, and, where appropriate, third-party enhanced due diligence and contractual commitments relating to ethical conduct and labour standards.

4. Our Controls

Our risk management framework includes controls to mitigate the risks of modern slavery throughout our business and supply chain, as follows:

Governance and Policies

Javelin's leadership team sets the tone from the top and promotes a culture of ethical conduct at every level of the organisation. Javelin has a dedicated Compliance Officer who oversees our Ethical Compliance Programme.

We maintain several internal policies designed to ensure our business is conducted ethically and transparently. These include our Anti-Bribery and Corruption (ABC) Policy, Code of Conduct, and Supplier Code of Conduct. In particular, our Supplier Code of Conduct sets out the standards we expect our suppliers to meet regarding forced labour and similar unethical practices. Our Corporate Social Responsibility statement also sets out our expectation that all businesses in our supply chain offer a safe workplace for their employees, free from harm, intimidation, harassment, and fear.

We place a contractual obligation on all medium- and high-risk suppliers to comply with our Supplier Code of Conduct. In addition, where appropriate, we include contractual rights to audit certain suppliers to verify that they are operating in accordance with our ethical standards.

Due Diligence

Appropriate due diligence is conducted on all new suppliers before we begin working with them. This includes Know Your Customer (KYC) screening, which, among other things, assesses potential risks relating to modern slavery and identifies any adverse media associated with previous modern slavery-related incidents.

Our ESG and Compliance Committee, comprising executive leadership and commercial directors, and led by our Compliance Officer, meets regularly to review and evaluate the results of supplier due diligence and the composition of the Javelin portfolio of counterparties, suppliers and customers/clients. It reports to the Javelin Board and Risk Committee.

As Javelin moves into new markets with a higher risk of modern slavery, we continue to develop our supplier due diligence processes to mitigate these risks. Suppliers will be required to assert their commitment to the eradication of modern slavery and present their policies to that effect. Where responses or other factors suggest an increased risk, Javelin will take steps to understand the supply chain in more detail and decide whether transacting with the supplier is consistent with its commitment to zero tolerance of modern slavery.

Whistleblowing Procedure

Javelin is committed to identifying and addressing inappropriate or illegal conduct within our business operations, including risks relating to modern slavery. As part of this commitment, we maintain a whistleblowing procedure that enables employees to raise concerns confidentially with appropriate senior personnel. We did not receive any whistleblowing reports relating to labour standards in 2025.

Training

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

5. Our Commitment

While Javelin has not identified any instances of forced or compulsory labour in our business or supply chain, we are acutely aware of the very real risk posed by modern slavery. We are committed to continually reviewing and strengthening our policies and procedures to ensure that we operate free from forced labour, human trafficking and slavery. In particular, we will:

- continue to enhance our risk assessment processes and the selection of ethical suppliers through ongoing KYC screening;
- continue to enforce the requirements set out in our Supplier Code of Conduct;
- continue to strengthen employees' understanding of modern slavery risks through training to ensure they remain vigilant and follow the controls in place to mitigate these risks;

- continue to promote our Whistleblowing Procedure to encourage employees to raise concerns.

Javelin Global Commodities Holdings LLP
Date: 30th June 2026

This statement is made by Javelin Global Commodities Holdings LLP and has been approved by its Management Board. The statement will be updated annually.