Modern Slavery & Human Trafficking Statement

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

ENGELHART does not tolerate slavery or human trafficking in its business or supply chains and we are committed to continually reviewing and improving our policies and practices to help prevent slavery and human trafficking and protect human rights.

About us

Engelhart Commodities Trading Partners ("ENGELHART") is a primarily financial commodities trading company with a presence in major global commodities hubs in Europe, North America and Asia. Given the focus on financial commodities trading and the limited number of counterparties that this involves, it has relatively low risk of exposure to slavery and human trafficking in its activities. **ENGELHART has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our corporate activities.** We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains and legal and contractual obligations.
In furtherance of this commitment, ENGELHART has applied a risk-based approach in implementing various policies which require employees to conduct due diligence and to assess not only business risks but also social and human rights concerns, including that of modern slavery. These policies include:

Our Policies

Global Compliance Manual

All ENGELHART employees are required to read, understand and acknowledge the ENGELHART Global Compliance Manual, which establishes the ENGELHART Principles of Business Conduct and Ethics. One of our core principles is that all staff should evaluate business risks taking human rights concerns into consideration.

In addition to being guided by the highest ethical standards and our own strict in-house compliance rules, we also:

- proactively cooperate with authorities and regulators to achieve and maintain optimal standards of risk management, respect, and transparency;
- periodically review policies and procedures, and provide internal training that reflects legal and regulatory requirements;

- perform the required diligence and monitoring ("Know Your Client") procedures;
- cultivate best industry practices and comply with the laws and regulations of the various jurisdictions where ENGELHART does business.

Environmental, Social and Corporate Governance Policy ("ESG Global Policy")

ENGELHART operates under a consistent focus on our actions' long-term implications and results, prioritizing these long-term benefits rather than short-term gains, and consistently appraising Environmental, Social and Corporate Governance ("ESG") risks, and opportunities. We believe that sound business practices and corporate responsibility are long-term drivers that must be applied daily to generate long-term value through sustainable growth, attractive recurring revenue streams, and an enduring, responsible business model.

ENGELHART's ESG Global Policy sets forth ENGELHART's Core ESG Principles, which include the fostering and protection of human rights with respect to business activities and in all stakeholder relationships, including our staff, partners, clients, shareholders, counterparties, authorities, and society.

Global Anti-Money Laundering / Counter-Terrorism Financing (AML/CTF), Sanctions, Embargoes, and Counterparty Identification Policies

Our AML Compliance Unit is responsible for implementing and managing the Counterterrorism and Anti-Money Laundering programs within ENGELHART. Working closely with the Onboarding department, the AML Compliance Unit 1) ensures that all new or existing suppliers and counterparties and 2) any payments sent to or received from third parties are properly screened and not in violation of any applicable AML/CTF laws or regulations, sanctions or embargoes.

As part of the extensive financial and operational due diligence carried out before the approval of any supplier or counterparty, questions are asked about such supplier/counterparty's due diligence procedures and whether the supplier/counterparty has a Business Code of Conduct which includes ethical principles.

Our supplier contracts and onboarding documentation require all suppliers and counterparties to adhere to our policies and standards.

Global Whistleblowing Policy

ENGELHART has a written policy and provides training to all employees on how to report any concerns related to the activities or supply chains of ENGELHART.

ENGELHART is committed to continuing to develop its understanding of the issues and mitigating the risks involved in slavery and human trafficking. To ensure that high-risk sectors of our supply chain are free from slavery and human trafficking, we will continue to encourage our employees to raise any concerns to allow us to address any issues that arise and improve our processes and controls.

Ongoing Efforts

ENGELHART currently engages in primarily financial trading activities and has relatively low risk of exposure to slavery and human trafficking in its supply chains. ENGELHART has committed to six of the U.N. Sustainability Development Goals (SDG) and has engaged an ESG working Group, a subcommittee of its Management Committee, to implement its ESG strategies. The ESG Working Group provides planning and oversight of ENGELHART's activities in the areas of environmental stewardship, social responsibility (including the protection of human rights), and ethical and transparent governance.

Since the publication of the Company's last Modern Slavery Statement, the ESG Working Group has focused primarily on building awareness and reducing inequalities in the Commodities sector. Working towards achievement of these goals complements and enhances our commitment to the prevention of slavery and human trafficking.

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutesEngelhart's slavery and human trafficking statement. It has been approved byEngelhart's Board of Directors and will be reviewed annually.

Huw Jenkins
Chief Executive Officer