



TRADEWILL
ROSATOM

Entity of TENEX JSC
Tradewill Limited

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Modern Slavery Act Statement

Tradewill Limited - Modern Slavery Act Statement

Introduction

This statement relates to **Tradewill Limited** covering its activities at all business regions. The statement relates to the financial year ending 31 December 2023.

The Modern Slavery Act 2015 (“the Act”) requires organisations with an annual turnover above £36 million to publish an annual slavery and human trafficking statement. Tradewill forms part of TENEX Group which annual turnover exceeds this threshold.

Statement outlines the actions taken by Tradewill to ensure slavery and human trafficking is not taking place in any of Tradewill’s business or supply chains. It also considers what further steps Tradewill can put in place to continually improve.

Tradewill is committed to preventing modern slavery and human trafficking. Tradewill will not tolerate the abuse of men, women or children and strives for total transparency right through its own business and supply chains.

Tradewill background

Tradewill is a wholly owned subsidiary of TENEX (Russian: АО «Техснабэкспорт») which in turn is a wholly owned subsidiary of State Atomic Energy Corporation “Rosatom”. ROSATOM is a Russian corporation headquartered in Moscow that specializes in nuclear energy. TENEX is its trade company engaged in supply of nuclear fuel cycle goods and services produced by the enterprises of Russia's nuclear industry. The company is one of the world's leading exporters of the enriched uranium product and uranium enrichment services (“SWU”). TENEX supplies a significant share of SWU requirements for western-type nuclear reactors.

Tradewill was established in June 2009 with its office located in London. As one of TENEX’s wholly owned foreign subsidiaries, Tradewill supports TENEX’s activities in marketing and sales of nuclear fuel products to various Western countries utilities, as well as its interaction with international agencies and

companies working in nuclear energy sector. Together with all TENEX group companies, Tradewill adheres to the strict operating principles, ethical standards and internal control system modelled on the UK's The Modern Slavery Act 2015 (the "Act").

Tradewill's Supply Chain

Tradewill will not engage in business with any supplier or individual known to engage in practices which are in breach of the Act and takes a zero tolerance view to any suppliers who are found in breach of the Act after contract award.

Tradewill's standard terms and conditions require its suppliers and each of their subcontractors to comply with the Act.

Tradewill use reasonable efforts to ensure that all its suppliers are financially, ethically and legally sound. If a supplier is found to be in breach of the Act, or found to have misled Tradewill during the tendering process, immediate steps will be taken to measure the impact of the breach, and if necessary terminate the contract.

Consideration has been given to Tradewill's supply chain and due to the geographical nature of its suppliers and the types of products/services procured, the risk is considered low. However, we are not complacent in any of our assumptions. Tradewill is committed (also being in compliance with its internal procurement standard) to periodic reviews of its suppliers, in particular where multi-year contracts are placed. This allows us to reassess any, or all, of the information provided at the time of the contract award and highlight any areas for improvement (supplier's competitiveness being one of them), including where the supplier is in breach of, or falling short of, the conditions of the Act.

Training

Tradewill is working to increase awareness within our organisation and to ensure a high level of understanding of the risks associated with modern slavery and human trafficking in our supply chains and in our business.

Further considerations

Tradewill shall carry out periodic reviews of its suppliers, in particular where multi-year contracts are placed to ensure that such contracts contain terms requiring its suppliers and each of their subcontractors to comply with the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Tradewill's slavery and human trafficking statement for the financial year ending 31st December 2023.

Valery Govorukhin
Director
Tradewill Limited
04.03.2024

