Policy:	Modern Slavery and Human Trafficking Statement		
Category:	General Information		
Date Approved:	Nov 2020	**Approved By:**	To be approved
Applicable to:	All Employees and Offices	**Version:**	V5

1 Introduction

- The Modern Slavery and Human Trafficking Statement details how Cockett Marine Oil (i.e.: Cockett Marine Oil Pte. Ltd. and its subsidiary entities and at all times include Cockett UK, CMOG Fuel DMCC and its subsidiary entities and Cockett Marine South Africa, hereafter "Group" or "Company" or "CMO") acknowledges that the Group has a zero – tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chain

2 Responsibility

Employees	Employer
Ensure understand the Group's strategy on modern slavery and human trafficking issues. Adopt measures and initiatives to improve the impact on the business environment.	The Board of Directors has overall responsibility for ensuring this statement complies with our legal and ethical obligations and that all those under our control comply with it. Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and are given adequate and regular training on it. Review policy annually.

3 Policy

SCOPE

The Group's Code of Ethics reflects the high standards of governance and ethical behaviour to which its management and employees including, are committed.

We expect our customers and suppliers to observe similar standards and to undertake their business in an ethical manner by complying with all applicable laws and regulations.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking 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.

The Group has a zero – tolerance approach to modern slavery and is committed to acting ethically and with integrity in all our business dealings and relationships and implementing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or supply chain.

SUPPLY CHAIN STANDARDS

In our procurement process, we require all new suppliers to agree to the Group's Supplier Code of Conduct which details that suppliers will:

- Ensure that labour conditions are in accordance with local regulations
- Compensate employees fairly and at least at a level where their basic needs are met and in compliance with local legislation

Maintain a work environment in which all employees are treated with respect and which precludes any form of harassment, exploitation or abuse.

The Group's suppliers will not:

- Engage in any form of conduct which is in breach of internationally declared human rights
- Directly or indirectly either employ child labour or use forced labour in any form
- Discriminate based on age, ancestry, race, marital status, disability, nationality, religion, political affiliation or sexual orientation.

The Group's guiding principles require suppliers to:

- provide a safe, secure and pleasant place to work;
- employ environmentally sustainable practices;
- act with honesty, integrity and appropriate business ethics;
- comply with the law

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner. Our due diligence process also requires new suppliers to report on all relevant areas of their business.

DUE DILIGENCE PROCESS

As a part of our initiative to identify and mitigate risk (including in relation to that of human trafficking and slavery), we follow the Group's policies and procedures in the following areas:

a. Whistleblowing
b. Anti-Bribery and Corruption
c. IT and Communications
d. Code of Conduct and Ethics
e. Anti-Trust Compliance

COMMUNICATION, AWARENESS AND BREACHES

- Training on this statement and on the risk our business faces from modern slavery forms a part of the induction process for all Cockett Group employees and regular training is provided. Any employee who breaches the statement will face disciplinary action which could lead to dismissal for misconduct.

- This statement is made under section 54 (1) of the Modern Slavery Act 2015 and constitutes Cockett UK's slavery and human trafficking statement for the financial year ending 31st December 2019.

4 Useful Resources

Resource	Description
Shareholder companies – Grindrod and Vitol	Review and adopt shareholder guidelines and best practice as and when appropriate

5 Version Control

Version	Date	Reason	Owner
V1	Nov 2016	New policy and old letter head	LJJ
V2	Nov 2017	Date change	LJJ
V3	Nov 2018	New letterhead and formatting done	LJJ
V4	Nov 2019	Updated to cover Cockett Marine Oil Pte. Ltd. and its subsidiaries and detailed newly introduced Anti Trust Compliance.	LJJ
V5	Nov 2020	Updated to new format	LJJ