

Cockett Group – Modern Slavery and Human Trafficking Statement

Policy:	Modern Slavery and Human Trafficking Statement		
Category:	General Information		
Effective Date:	November 2023		
Date Approved:	November 2023	Approved By:	CGH Board of Directors
Applicable to:	All Employees	Version:	V8

1 Introduction

The Modern Slavery and Human Trafficking Statement details how we Cockett Marine Oil (i.e. Cockett Group Holding Limited and its subsidiary entities, CMOG Fuel DMCC and its subsidiary entities, Cockett Marine South Africa, hereafter “Group” or “CMO” and “Company” for any individual entity forming part of the Group) acknowledges that the Group has a zero – tolerance approach to Modern Slavery. Furthermore, we are 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 Definitions

EMPLOYEES	All Employees of the Group working at all levels and grades (whether permanent, fixed term or temporary), including but not limited to directors, senior managers, officers, trainees, seconded staff, home based staff, casual staff, agency staff, volunteers and interns.
SUPPLIER/S	A person or organisation that provides something which the Group requires such as a product or service.
STAKEHOLDERS	People with an interest or concern in CMO business e.g., shareholders
BUSINESS PARTNERS	A person who performs services for or on behalf of CMO, which involves engaging with third parties on behalf of CMO. A business partner can be an individual or an incorporated or unincorporated body. The following persons may, inter alia, be a business partner: • A third party who engages with customers or prospective customers in order to win or retain business for CMO; or • A third party who engages with any government official for and on behalf of CMO.
CODE OF ETHICS	Is a guide of principles designed to help professionals conduct business honestly and with integrity.
MODERN SLAVERY	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.

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3 Responsibility

Employees	Employer
Ensure understanding of the Group's statement on Modern Slavery and human trafficking issues.	- The Board of Directors has overall responsibility for ensuring this statement complies with Group 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.

4 Policy

4.1 Scope

The Group's Code of Conduct, Business Practices and Ethics policy reflects the high standards of governance and ethical behaviour expected of its Employees, Business Partners and Stakeholders.

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.

4.2 Modern Slavery and Human Trafficking Statement

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.

4.3 Supply Chain Standards

In our procurement process, we require all new Suppliers to agree to the Group's Supplier Code of Conduct policy 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; and
- 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; and
- Discriminate based on age, ancestry, race, marital status, disability, nationality, religion, political affiliation or sexual orientation.

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The Group's guiding principles require Suppliers to:

- Provide a safe, secure and professional place to work;
- Employ social and environmentally sustainable practices;
- Act with honesty, integrity and appropriate business ethics; and
- Comply with the law.

We reserve the right to terminate our relationship with a Supplier if issues of non-compliance with our policies is 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.

4.4 Due Diligence Process

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

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

4.5 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 2023.

5 Useful Resources

Resource	Description
Group Supplier Code of Conduct Policy	Policy held on Hub Library under Policies section
Group Code of Conduct, Business Practices & Ethics Policy	Policy held on Hub Library under Policies section

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6 Version Control

Version	Date	Reason	Owner
V1	November 2016	New policy and old letter head	Director Group Support Services
V2	November 2017	Date change	Director Group Support Services
V3	November 2018	New letterhead and formatting done	Director Group Support Services
V4	November 2019	Updated to cover Cockett Marine Oil Pte. Ltd. and its subsidiaries and detailed newly introduced Antitrust Compliance.	Director Group Support Services
V5	January 2021	Update and new format	Director Group Support Services
V6	November 2021	Updated with minor changes	Director Group Support Services
V7	November 2022	Updated with minor changes	Director Group Support Services
V8	November 2023	Version change and updated the year end in clause 4.5	Director Group Support Services