

Modern Slavery Act Statement

This statement is made under section 54 (1) of the Modern Slavery Act 2015 (*the Act*) and sets out the steps that Longulf Trading (UK) Limited took during our financial year ended 31.12.2022 to ensure that slavery and human trafficking does not occur anywhere in our supply chain or in any part of our business.

This statement will be reviewed and updated annually.

Organisational structure and business

Longulf is a UK incorporated business headquartered in London with offices in India, China, Slovakia, Turkey, Egypt, Morocco, Kenya, Ethiopia, and Djibouti.

Longulf focuses on providing supply services to our clients and business partners to support transactions between Europe, North America, Asia, the Middle East and North Africa region (MENA) in the following core business areas:

- Food and Non-Food raw materials for use in manufacturing industry
- Plant, equipment and spare parts

As a materials and equipment provider Longulf has a relatively straightforward supply chain. Our key suppliers include multinational and leading manufacturers of raw materials, capital equipment and proprietary spare parts.

Policies and controls

Longulf is committed to act honestly, ethically and with integrity in all our business relationships and we expect our suppliers to share those values. Longulf is fully supportive of the principles underlying the Act and will not knowingly support or conduct business with any suppliers who are involved in slavery or human trafficking. Longulf has conducted a preliminary assessment of our internal policies and controls and identified those which are relevant to assisting in the prevention, detection, management and reporting of slavery and human trafficking in our supply chain and across our business. These include policies or controls relating to:

- Reputational risk
- Supplier/ third party management
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Anti - Harassment and Bullying Policy
- Code of Conduct

Each of the relevant policies is reviewed at least annually and as part of the review cycle will be further enhanced as appropriate in accordance with the principles of the Act.

Supplier adherence to our values

Longulf has a system in place to identify and assess the potential risk areas in our supply chains.

Longulf has zero tolerance to slavery and human trafficking. To ensure all these in our supply chain and contractors comply with our values we operate a risk-based approach to review suppliers who may carry a higher risk in this respect. We have enhanced our supplier and third-party management framework with a Supplier Code of Conduct affirming our commitment to combatting slavery and human trafficking in our supply chain. We are implementing this alongside other regulatory changes and review all contractual arrangements during 2023 and updating where appropriate.

We have a dedicated Compliance team, which consists of representatives from following departments:

- Human Resources
- Compliance

Due diligence

We consider ourselves to be a 'low risk' business with regard to slavery and human trafficking. However, we foster a culture that encourages the identification and reporting of any such risks within our business. We recruit all our employees either directly or through recruitment agencies who are members of the Recruitment and Employment Confederation.

Assessing and managing risk

We have a whistleblowing policy in place and, as part of our efforts to identify and mitigate risks within our supply chain, we are introducing systems to identify, assess and monitor potential risk areas.

Effectiveness in combating slavery and human trafficking

We will regularly review the following to assess our effectiveness in relation to the steps taken to ensure slavery and human trafficking is not taking place in our business or supply chain:

- Risk-based checks against our Supplier Code of Conduct and any relevant provisions in our contracts with suppliers

- Monitoring relevant reporting through our Whistleblowing Policy

- Risk-based compliance monitoring of adherence to relevant policies and procedures, including supplier due diligence procedures.

Training

Longulf recognizes the importance of raising awareness in this area. We want our people to understand more about this serious issue and how to report any suspicions they may have, whether in a business or personal context.

We already have in place a whistleblowing policy and helpline which ensures that anyone with concerns has a means of raising them confidentially. The policy supports employees in reporting any suspicions regarding modern slavery and our employees have been signposted to this in our communications alongside the Modern Slavery website.

Longulf has an in-house training module that has been undertaken by all Longulf Employees. This training outlines what modern slavery and human trafficking are, how to identify it and what individuals should do if they suspect there are any cases of slavery or human trafficking occurring. Completion of this training is a compulsory part of our new starter induction process as well as the refresher training must be taken by all Longulf Employees every three years.

Longulf uses only reputable employment agencies to source labor and always verifies the practices of any new agency it is using before accepting labor from that agency. Where we recruit candidates directly, we have robust recruitment processes in line with UK employment laws, including right to work document checks & background checks including contract of employment and checks to ensure everyone employed is 16 and above.

Board Approval

This statement has been reviewed by Longulf senior management and was approved by The Longulf Board of Directors on 27/04/2023.

Signed on behalf of the Board of Directors of Longulf Trading (UK) Limited.

Dirhem Abdo Saeed Anam
Managing Director