

## **MODERN SLAVERY AND HUMAN TRAFFICKING**

### **POLICY STATEMENT**

**This statement relates to the financial year ended 31 December 2018 and informs the Policy of the Company during 2019**

apioil UK Limited (the "Company") is committed to supporting the intention to drive out acts of modern day slavery and human trafficking within its international business and/or any of its associated supply chains, including sub-contractors, and partners.

The Company has always adopted a conservative approach to its trading operations and in doing so has always endeavoured to trade with suppliers and customers it knows well and trusts. It will continue to approach its supplier and customer relationships cautiously in the future.

The Company's directors acknowledge that the processes that were to be adopted in relation to the implementation of the Policy during 2018 are still evolving as a result of the appointment of a new Managing Director during 2018. The Directors are now actively reviewing the current means by which the Company should continue implementing its Policy and an updated Policy Statement will be issued as soon as possible.

The Company acknowledges its responsibility to support the purpose of the Modern Slavery Act 2015 and will endeavour to ensure transparency within its organisation and with suppliers of crude oil and related services to its organisation, in addition to those of suppliers of services who make up the logistical supply chain to the Company. As part of the company's due diligence processes into slavery and human trafficking the Company is in the process of:-

- implementing an awareness and reporting process to inform its employees on their role in the Company's policy including a reporting process to inform the Company's Directors of any concerns the employees may have.
- The supplier approval process is being evaluated to endeavour to ensure it incorporates a review of each supplier which acknowledges the fact that shipments of crude oil from sources from outside the UK are potentially more at risk from slavery/human trafficking issues. That will involve assessment of our supply chain in order to
  - (a) ratify our approach to supplier due diligence; and
  - (b) identify a suitable approach to effective communication with suppliers to raise their awareness of the purposes of the Modern Slavery Act 2015 and the stance of the Company towards procuring its elimination from the Company's business supply chain.

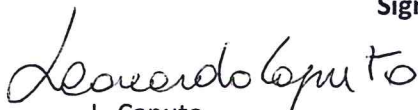
So far as reasonably practical, the level of management control required from both prime suppliers and service providers will be continually monitored and suppliers will be informed that the Company will not support or deal with any business which it knows or has specific reason to suspect is involved in slavery or human trafficking.

The Company's Directors shall take responsibility for implementing this policy statement and its objectives and shall seek to provide reasonable resources in terms of enhancing awareness and any investment that it would be reasonable in the circumstances to make to try and encourage the eradication of any slavery and human trafficking if it is discovered within any of the Company's supply chains.

A copy of the Company's policy and a copy of the Modern Slavery Act 2015 will be made accessible to all employees electronically and a copy of the Company's policy will be sent electronically to all our primary suppliers and service partners whenever it is considered appropriate or whenever requested to do so.

This policy statement will be reviewed annually and a copy of it provided on reasonable notice when requested by anyone. Meanwhile this Policy Statement takes into account and supports the policies, procedures and requirements which are intended to be documented in the future in the ApiGroup Integrated Management procedures. The implementation and operation of the management procedures system will underline our commitment to this policy. Formal procedures concerning slavery and human trafficking will include appropriate disciplinary procedures where any are breached by its employees. Additional procedures will be regularly reviewed by the Directors to ensure their continuing suitability and relevance to the Company's activities.

**Signed on behalf of API oil UK Limited:**



L. Caputo

**Director**

**22<sup>nd</sup> March 2019**