

November 2019

COCKETT MARINE OIL LIMITED (“Cockett UK”)
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

INTRODUCTION

Cockett UK is incorporated in the UK and is a wholly owned subsidiary of Cockett Marine Oil Pte. Ltd.. Cockett Marine Oil Pte. Ltd. and its subsidiaries and affiliates are referred to as Cockett Group in statement details below and at all times include Cockett UK.

Established in 1979, the Cockett Group has grown to become one of the World’s largest value-added resellers of worldwide marine and petroleum products and services.

Cockett Group’s mission is to use extensive market experience to assist our working partners in sourcing their energy needs; achieving the most competitive prices whilst guaranteeing a high quality of service, reliability and product

Cockett Group operates world-wide from 15 offices at strategic locations across five continents providing a global service 365 days a year, 7 days a week, 24 hours a day.

SCOPE

Cockett 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.

Cockett 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 Cockett 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.

Cockett 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 Cockett 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 Cockett Group's policies and procedures in the following areas:

- a. Whistleblowing
- b. Anti-Bribery and code of conduct
- c. Communications
- d. Code of Ethics
- e. Anti-Trust Compliance

RESPONSIBILITY FOR THE STATEMENT

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.

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.

This statement has been approved by the Cockett Group's Board of Directors and will be reviewed annually.

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