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Anti-Slavery Policy

Policy 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.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. The policy does not form part of any employee's contract of employment and we may amend it at any time.

Responsibility For The Policy

The Managing Director has overall responsibility, and each function head in their area has responsibility, for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given any required training.

Compliance With The Policy

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager or the HR Department as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue of suspicion of modern slavery in any parts of our business or the supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chain constitutes any of the various forms of modern slavery, raise it with your manager or the HR Department.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any part of our supply chain. If you believe that you have suffered any such treatment, you should inform your manager immediately.

Communication And Awareness Of Policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chain will be given where needed.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches Of This Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Nick Goodwin

A handwritten signature in black ink, appearing to read 'Nick Goodwin', with a long horizontal line extending to the right.

Managing Director

Standard Fuel Oils Ltd's Slavery and Human Trafficking Statement

Our business

We are an independent distributor of fuel and lubricants supplying commercial, industrial, marine and agricultural customers with a range of bulk fuels, lubricants and associated products throughout the UK.

We predominantly operate in the North West of England where our fleet and head office are located. Recently we have expanded into North Wales and the North East where we have established a strong customer base and supply chain.

We have a relatively small UK-wide business, however our network of supply partners is vast and spreads across a number of organisations. It is therefore imperative that we, to the best of our ability, ensure that no one within our company or our supply chain engages in any activity relating to the slavery or human trafficking of any individual.

Our expectations – Standard Fuel Oils Ltd

- We ensure that all staff directly employed by Standard Fuel Oils Ltd do so at their own free-will and understand that they can cease their employment at any time under the terms of their employment contract.
- We compensate all staff directly employed by Standard Fuel Oils Ltd with wages and benefits packages that meet or exceed statutory minimum requirements and are a Living Wage employer.
- We abide by the Working Time Directive, unless staff directly employed by Standard Fuel Oils Ltd voluntarily choose to opt-out (within the limitations imposed by the Working Time Directive).

Our expectations – Our suppliers

- Standard Fuel Oils Ltd suppliers are required to certify that they do not engage in slavery or human trafficking, or any activity associated with these offences.
- Standard Fuel Oils Ltd suppliers who supply materials used for Standard Fuel Oils Ltd business are required to certify that each product complies with the Modern Slavery Act 2015 and any other law regarding slavery and human trafficking of the country/countries in which the materials are sourced.
- Any new supplier entering into a contract or tendering for work with Standard Fuel Oils Ltd has to provide us with details of their policies on slavery and human trafficking, as well as providing assurances that they, or anyone within their own supply chain, do not engage in slavery or human trafficking, or any activity associated with these offences.

Policy

Standard Fuel Oils Ltd has a zero tolerance policy on slavery and human trafficking within its business and supply chains. Our policy is applicable to all staff who work for Standard Fuel Oils Ltd, including

temporary workers under contract, and we expect all 3rd parties who act on our behalf, to abide by that policy.

Our policy on slavery and human trafficking can be viewed on our website at <https://standardfueoils.co.uk/wp-content/uploads/2021/02/Anti-Slavery-Policy.pdf> or a request can be made, in writing, to receive a hard copy by post.

Audit

Although we see our business as 'low risk' in relation to the threat of slavery and human trafficking offences being committed, we carry out compliance audits on an appropriate sample size on a regular basis. These audits are carried out by our internal audit team and reported to our Board. Given our business model, we believe this approach to be proportionate, given the nature of our business, the geographical remit in which we operate and the due diligence processes we undertake before appointing reputable contractors and 3rd party suppliers.

Staff training

We offer periodic training sessions on slavery and human trafficking to all staff. This training also forms part of our induction process for all new starters to the business.

Annual update – 2019/20 financial year

There have been no instances of suspicious activity in our supply chain.

Standard Fuel Oils Ltd has undertaken detailed review of its procurement processes in this financial year and following that review has strengthened its controls on process, documentation and education for staff.

Approved by Standard Fuel Oils Ltd Board on 19th August 2020