

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR ENDING 31 MARCH 2021**

### **INTRODUCTION FROM THE DIRECTORS**

Integr8 Fuels Europe Limited (“Integr8”) provides bunker trading and brokerage services to shipowners and operators that enables them to optimise fuel procurement. With a global relationship base of vetted suppliers, and extensive knowledge and experience of vessel operations and local bunkering requirements, we deliver a market-leading quality of supply and service. Combined with availability of substantial credit capacity, we enhance the logistics, timing, terms and pricing of bunker procurement for customers.

Integr8’s Anti-Slavery and Human Trafficking Policy demonstrates our commitment to:

- Acting ethically and with integrity in our business relationships, and
- Implementing and enforcing effective systems and processes,

to ensure modern slavery or human trafficking is not taking place anywhere in our own business or in any of our supply chains.

Integr8 has zero tolerance for slavery and human trafficking and is committed to respecting the rights and dignity of all people and to operating in accordance with the UK Modern Slavery Act 2015.

### **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

Integr8 is subject to the UK Modern Slavery Act 2015.

As part of our Global Business Conduct Guidelines, Integr8’s Anti-Slavery and Human Trafficking Policy details our intention to be cognisant of and identify any potential risk areas in our supply chains and to protect any whistle blowers if any such risks are found and reported. We encourage openness and will support any member of staff raising genuine concerns.

We require all staff members to have read, understood and comply with Integr8’s Anti-Slavery and Human Trafficking Policy. Our zero-tolerance approach means that any breaches of this policy will result in disciplinary action.

One of Integr8’s objectives is to be an equal opportunities employer in all respects, and we endeavour to promote job applications from all sections of the community. Part of our recruitment process includes eligibility checks to ensure staff are safeguarded against human trafficking or being forced to work against their will.

Integr8 regularly reviews all of its policies to ensure their suitability and relevance to our business activities. The policy was reviewed in the 2019/2020 financial year and was communicated to all staff members.

### **RISK ASSESSMENT – SUPPLY CHAINS**

Integr8’s Board and management teams consider there is minimal risk within Integr8 that there are any processes in which we could be seen to support or be complicit in slavery and human trafficking. Accordingly, the key risk areas are within Integr8’s supply chain. We consider that the greatest risk of modern slavery in our supply chains is when we deal with companies based in jurisdictions which do not have equivalent standards and legislation to the UK.

## **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Integr8 will not knowingly support any business involved in slavery or human trafficking. We expect our suppliers and contractors to take steps to not use forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Our suppliers are expected to hold their own suppliers to the same standards. We will cease to conduct further business with a counterparty that cannot demonstrate it is engaging in efforts to meet these standards.

In the 2020/2021 financial year, Integr8's legal department drafted an anti-slavery and human trafficking clause that, starting from the 2020/2021 financial year, is included in the Confirmation Notes that Integr8 sends to its sellers/ suppliers. This clause requires Integr8's sellers/suppliers to confirm and warrant, amongst other things, that they shall conduct their activities in compliance with the UK Modern Slavery Act 2015 and the UN Universal Declaration of Human Rights, including without limitation refusing to use forced or compulsory labour, not tolerating workplace discrimination, harassment or abuse and providing a safe and healthy workplace and work conditions and standards that meet or exceed applicable legal standards and regulations. It also requires Integr8's sellers/suppliers to ensure that their own suppliers are held to these standards.

## **TRAINING**

To ensure an appropriate level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, training on Integr8's policy forms part of the induction process for all staff members, and further training will be provided as necessary.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Integr8's slavery and human trafficking statement for the financial year ending 31 March 2021. The directors of Integr8 Fuels Europe Ltd approved this statement on 30 September 2021.



Jonathan Keats, Director

Date: 30 September 2021