



### **Modern Slavery Act Statement 2023**

This statement has been published in accordance with the UK Modern Slavery Act 2015 ("MSA") and has been approved by the managing directors of Mabanaft Limited. It sets out the steps taken by Mabanaft Limited and its subsidiaries B.W.O.C Limited, Thomas Silvey Limited, Junction 29 Limited, Onroute Truckstops Limited, Swindon Truckstop Limited, and South Eastern Fuels Limited ("Mabanaft UK Group"), during the financial year ending 31 December 2022.

Mabanaft UK Group acknowledges its responsibilities under the MSA to prevent modern slavery and human trafficking and is committed to preventing it occurring within its businesses and supply chains.

#### **OUR STRUCTURE**

Mabanaft UK Group is an independent fuel importer, wholesaler and distributor operating in the United Kingdom. Mabanaft Limited and its subsidiaries have an aggregate annual turnover exceeding £36m.

Mabanaft UK Group supplies fuel to distributors, retailers, hauliers, supermarkets, airlines, domestic end-consumers and the commercial/industrial sectors and has storage positions at a portfolio of sea-fed fuel terminals throughout the UK.

Mabanaft UK Group is also one of the largest independent fuel card operators in the country. To find out more about the nature of the Mabanaft UK Group please click here:

<https://www.mabanaft.co.uk/>

<http://www.bwoc.co.uk/>

<https://www.silveyfleet.co.uk/>

<https://www.onroutetruckstops.co.uk/>

Mabanaft UK Group employs over 190 people and is part of the Marquard & Bahls Group who operates in 29 countries and with over 4,000 employees. The ultimate holding company of Mabanaft Ltd is Marquard & Bahls AG ("M&B"), a limited liability joint-stock company registered in Hamburg, Germany.

#### **OUR SUPPLY CHAINS**

Our supply chains include companies within M&B and other reputable fuel-supply companies. These, as well as the suppliers of various other products and services, form our supply chains.

#### **Mabanaft Limited**



#### **OUR POLICIES ON ANTI-SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chains. The Mabanaft Code of Conduct reflects our commitment to acting ethically, and with integrity in all our business relationships, and to implementing controls to ensure unethical practices including, but not limited to slavery and human trafficking is not taking place anywhere in our business or supply chains. We expect our contract partners and suppliers to have substantially similar codes of conduct as ours and comply with all applicable laws.

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

As part of our initiative to identify and mitigate risks, we take steps to verify, evaluate and address risks of slavery and human trafficking in our businesses and supply chains. The first step is to set up clear expectations for all our employees contract partners and suppliers.

We have zero tolerance for slavery and human trafficking and will not trade with any person where we have good reason to believe they exploit people or do not comply with any applicable laws and regulations. Additionally, we comply with the following principles in our businesses and will not trade with any person that fails to do likewise:

- Employment is to be freely chosen, so that there is no forced or bonded labour;
- No use of child labour;
- Working hours should not be excessive; and
- There should be no harsh or inhumane treatment of workers.

The Labour Standards Policy within the Mabanaft Code of Conduct reflects our commitment to provide employees with a fair, decent and ethical work environment in line with the standards set by the International Labour Organization.

#### **MONITORING**

We recognise that preventing any risks of slavery or human trafficking within our supply chains is an ongoing, rather than a static process. Accordingly, these risks will be kept under regular review. The directors of the Mabanaft UK Group have an overall responsibility for implementing this statement and providing adequate resources and investments to ensure that slavery and human trafficking is not taking place within our businesses or supply chains.

#### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our businesses or supply chains, we provide training to all relevant members of our staff.

#### **Mabanaft Limited**



### Next Steps

We continue to engage with our contract partners and suppliers to confirm their compliance with the MSA. We are implementing new contract clauses to request contract partners and suppliers to confirm their compliance with the applicable laws and regulations. We will continue to review the effectiveness of these controls going forward.

This statement is made pursuant to section 54(1) of the MSA and it has been approved by the managing directors of Mabanaft Limited and it constitutes our anti-slavery and human trafficking statement for the financial year ending 31 December 2022.

Jay Nair  
Mabanaft Limited  
Director

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Date: 23-May-23 | 16:29 CEST

Harjinder Suglani  
Mabanaft Limited  
Director

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Date: 23-May-23 | 16:32 CEST