

## MODERN SLAVERY ACT

### MODERN SLAVERY ACT 2015 AND TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

**This statement is published on behalf of Sovcomflot (UK) Ltd pursuant to section 54(1) of the Modern Slavery Act 2015. This statement constitutes the Sovcomflot (UK) Ltd's Modern Slavery and Human Trafficking Statement for the financial year ended 31st December 2017.**

#### About Sovcomflot UK Ltd ("SCF UK")

The principal activity of the company continues to be the provision of commercial maritime agency services to fellow group companies within the Sovcomflot Group ("SCF Group"). Our strategy is to offer 'best in class' integrated commercial services underpinned by our culture as a socially responsible business with ethical behaviour as a core value.

#### Modern Slavery and Human Trafficking

SCF UK recognises that slavery, servitude, forced labour and human trafficking ("Modern Slavery") is a global and growing issue. No sector or industry can be considered immune. We are committed to ensuring that there is no Modern Slavery of any kind within our operations or supply chains.

SCF UK's Code of Conduct (the "Code") is a set of principles and guidelines which support ethical behaviour and decision making at SCF UK. All employees are expected to adhere to the terms of the Code and to engage with any third parties who work on behalf of SCF UK to ensure that they also co-operate with the Code.

If an employee has a concern about any activities in SCF UK's business, the Code provides a mechanism by which they can notify management. It is expected that all notifications under this Code are investigated as a matter of priority in order to reach a prompt resolution.

#### Respecting Employees' Rights

SCF UK believe that respect of human rights is integral to being a responsible company.

SCF UK places value on difference and believes that diversity of people, skills and abilities is a strength that helps us to achieve our best. Any discrimination based on race, religion, nationality, gender, age, marital status, disability, sexual orientation or political affiliation is prohibited within the business.

We are committed to providing a workplace free of any form of harassment or discrimination and expect our suppliers to do the same.

#### Our Supply Chain

The supply chain to our business comprises suppliers providing a range of support functions and products including office supplies, couriers, maintenance, information technology, cleaning and security.

Next steps:

SCF UK are committed to building and strengthening our existing policies and practices to eliminate Modern Slavery and human rights violations within our supply chain.

Our next step is to review the effectiveness of the current arrangements and, where necessary, implement additional safeguards and procedures. This is expected to include:

- Review of existing procurement procedures and other relevant internal policies and procedures and make recommendations for any appropriate changes.
- Include specific requirements in our procurement vetting processes for prospective suppliers to disclose their position on human rights, modern slavery and human trafficking and require them to provide statements or evidence of policies/procedures as appropriate.
- Risk assessment of supply chains to identify areas which may at higher risk of Modern Slavery and/or human trafficking;
- Appropriate training for our employees regarding the Modern Slavery Act requirements.

We will also liaise with our fellow group companies to expand the existing SCF Group wide policies such as the Anti-Bribery Policy, to include more specific guidance on Modern Slavery and any other areas of corporate social responsibility ("CSR").

CSR at least covers human rights, labour and employment practices (such as training, diversity, gender equality and employee health and well-being), environmental issues (such as biodiversity, climate change, resource efficiency, life-cycle assessment and pollution prevention), and combating bribery and corruption. Community involvement and development, volunteering, the integration of disabled persons, and consumer interests, including privacy, are also part of the CSR agenda. The promotion of social and environmental responsibility through the supply-chain, and the disclosure of non-financial information, are recognised as important cross-cutting issues.

In addition, we will aim to implement the three principles of good tax governance – namely transparency, exchange of information and fair tax competition – in relations between states.

This statement has been approved by the board of Sovcomflot (UK) Ltd on 25<sup>th</sup> October 2018.



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Managing Director

Date: 25<sup>th</sup> October 2018