



MERCURIA

Anti-Slavery and Human Trafficking Policy

Mercuria's Anti-Slavery Statement:

"Mercuria has a zero-tolerance policy when it comes to modern slavery and human trafficking. We are opposed to all forms of modern slavery in whatever form and are committed to contributing to the combatting of it in whichever way we can. We expect all of the suppliers, consumers, counterparties, vendors and partners that we work with to behave in a way that is consistent with this policy".

As a global physical commodity trading company, Mercuria plays a pivotal role in balancing supply and demand across various markets. Our core business is sourcing, supplying, refining, transforming, storing and transporting physical commodities. Due to the nature of our business, our operations extend into regions with heightened risks related to human rights. We are aware of the adverse risks that can arise when operating in such areas, and we are committed to conducting our business with the highest respect for human rights in all areas we operate in. Modern slavery is a criminal offence under the Modern Slavery Act 2015. It encompasses various forms of exploitation, including forced or compulsory labour, human trafficking and child labour. Modern slavery practice violates basic human rights, and it often involves the use of control, deception or force to exploit individuals for labour or services against their will, including the exploitation of children in harmful and dangerous conditions. Mercuria has a zero tolerance towards modern slavery and is committed to opposing all its forms. Our commitments align with the UK Modern Slavery Act and the International Labour Organization's Conventions 138 and 182 on minimum age of employment and worst forms of child labour, respectively. We expect that all our business partners acquaint themselves with Mercuria's stance on this matter and consistently act in alignment with our position.

In our dedicated effort to combating Modern Slavery, we have implemented comprehensive policies and procedures mandating continuous due diligence throughout our network of business partners, suppliers and clients. This initiative spans our supply chain, ensuring rigorous scrutiny and adherence to the highest ethical standards. Furthermore, we apply strict due diligence procedures to all current and prospective business investments and acquisitions, ensuring our ethical practices are integrated into every aspect of our operations. Our human rights due diligence process encompasses thorough examinations of third-party entities, focusing on their organizational structure, operational procedures and recent developments. It also involves reviewing pertinent policies associated with these entities and

conducting on-site checks. Additional due diligence is performed when traded products originate from areas with enhanced and heightened risk of child labour, based on the [UNICEF's Children Rights in the Workplace Index](#) of June 2023¹ (please refer to the list for both enhanced and heightened child labour risk countries). The heightened child labour countries are the most critical and are the following:

- Central African Republic
- Chad
- Equatorial Guinea
- Eritrea
- Guinea-Bissau
- Libya
- Niger
- Papua New Guinea
- Somalia
- South Sudan
- Yemen

The aim of the due diligence is to identify, prevent, mitigate and account for adverse effects on human rights, including child labour. Mercuria has contractual provisions in its contracts which require compliance with anti-slavery laws and has various policies applicable to staff which relate to compliance with this principle.

All of our employees are required to be well-informed about and compliant with Mercuria's position on modern slavery, including child labour and human trafficking.

Employees should be vigilant and aware in their dealings with suppliers and consumers. If there are any concerns or indications that there is any potential modern slavery, human trafficking or other human rights violations employees should notify the Corporate Responsibility & Compliance team immediately and before proceeding or continuing with any business activity. Additionally, the company's whistleblowing procedures can be followed to report such concerns.

You can reach the Mercuria Corporate Responsibility & Compliance team by emailing ComplianceGlobal@mercuria.com or telephoning the Corporate Responsibility & Compliance Hotline on +1 832 531 7700

¹ <https://www.unicef.ch/en/what-we-do/national/partners-and-initiatives/childrens-rights-and-business>
> Children's Rights and Business Atlas (Excel)