

Modern Slavery Act Statement 2019

This statement has been published in accordance with the Modern Slavery Act 2015 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 and South Eastern Fuels Limited ("**Mabanaft UK Group**"), during the financial year ending 31 December 2018.

Mabanaft UK Group acknowledges its responsibilities under the Modern Slavery Act 2015 to prevent modern slavery and human trafficking, and is committed to preventing it occurring within its business and supply chain.

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 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:

http://www.mabanaft.co.uk/Mabanaft/en/about_us/index.php.

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

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

Mabanaft UK Group is part of the Marquard & Bahls Group. The ultimate parent company of Mabanaft Ltd is Marquard & Bahls AG ("M&B"), a 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.

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 M&B 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 contractors and suppliers to act consistently with our Code of Conduct.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

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

We have zero tolerance to 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 local laws and regulations. Additionally, we comply with the following principles in our business 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 M&B 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 risk of slavery or human trafficking within our supply chains is an ongoing, rather than static, process. Accordingly, this risk will be kept under regular review. The directors of the Mabanft UK Group have overall responsibility for implementing this statement and providing adequate resources and investment to ensure that slavery and human trafficking is not taking place within our business or its supply chains.

TRAINING

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

NEXT STEPS

We continue to engage with our suppliers to confirm their compliance with the Modern Slavery Act 2015. We are implementing new contract clauses to request suppliers to confirm their compliance with the legislation. We will continue to review the effectiveness of these controls going forward.

This statement made pursuant to section 54(1) of the Modern Slavery Act 2015 has been approved by the managing directors of Mabanafit Limited and constitutes our anti-slavery and human trafficking statement for the financial year ending 31 December 2018.

A handwritten signature in black ink that reads "A.C. Jones".

Amy Jones
Managing Director
B.W.O.C. Limited

26th July 2019