

## KOCH COMMODITIES EUROPE LIMITED MODERN SLAVERY ACT DISCLOSURE

This statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') by Koch Commodities Europe Limited (KCEL)

### **Internal Management Procedures**

KCEL is a UK registered commodities trading company with a global reach. The company acts as a principal in the traded markets of commodity products including base metals and liquid natural gas. KCEL is not aware of major internal or external risks in relation to human trafficking/slavery in the trading of these commodities.

KCEL is committed to conducting all business lawfully and with integrity. KCEL's commitment to and expectations for ensuring that our business and supply chain is maintained in a lawful and socially responsible way includes, among other things, that neither human trafficking nor slavery/forced labour is taking place in any part of our business, and that our suppliers not use forced labour in any of its forms, including human trafficking and slavery, to produce the products they provide to KCEL. KCEL's compliance and ethics expectations are set out in the Koch [Code of Conduct](#), and in training and other communications we provide to our own employees, officers, advisers, agents and representatives, as well as our suppliers and other third parties.

### **Supplier/Supply Chain Management**

Evidence of the management of our compliance and ethics expectations in relation to human trafficking and slavery/forced labour in our supply chains, can be found in Koch's Code of Conduct, which states:

Our companies strive to make people's lives better through the products we make, support for the communities in which we live and work, maintaining quality work environments, and sourcing responsibly. We are committed to adhering to applicable employment and labor laws everywhere we operate. This includes observing those laws that pertain to child labor, forced labor, human trafficking, wages and work hours and freedom of association.

Due to the perceived low risk, KCEL does not take additional measures to ensure suppliers are in compliance with these internal expectations and does not incorporate terms into standard form contracts with suppliers.

### **Supplier Audits**

Due to the perceived low risk, KCEL does not have a supplier audit program.

### **Direct Supplier Certification**

Many of KCEL's commercial agreements require supplier compliance with applicable laws and regulation. Due to the perceived low risk, KCEL does not have a direct supplier certification process specifically focused on human trafficking and slavery.

### **Accountability Standards**

Non-compliance with laws, regulations and our standards regarding human trafficking and slavery – whether by a supplier or an employee – will result in corrective action, up to and including termination of the relationship, depending on the circumstances. Internal auditors and business representatives would work with suppliers, employees and possibly third-party resources to resolve any instances of non-compliance. The Koch Code of Conduct identifies numerous avenues for reporting compliance concerns, including on an anonymous basis (where allowed by law). Such concerns are objectively investigated under the guidance and direction of our compliance or legal departments. KCEL prohibits retaliation against anyone who, in good faith, raises a concern.

### **Training on Human Trafficking & Slavery**

Due to the perceived low risk, KCEL does not have a comprehensive, mandatory training program focusing on human trafficking and slavery.

### **Verification**

Other than the steps and practices described above, due to the perceived low risk, KCEL does not have a separate, comprehensive verification process for evaluating and addressing the risks of human trafficking and slavery.

This disclosure applies to the practices of Koch Commodities Europe Limited.

This statement is made and reflects the position as at 21<sup>st</sup> June 2018 and has been approved by the Board of Koch Commodities Europe Limited.

Signed and dated in London, UK on 21<sup>st</sup> June 2018. Official copy may be available on request.