

## KOCH METALS TRADING LIMITED MODERN SLAVERY ACT DISCLOSURE

This statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') by Koch Metals Trading Limited (KMTL) for the financial year ending 31<sup>st</sup> December 2024.

### **Internal Management Procedures**

KMTL is a UK registered commodities trading company. The company acts as a principal in the traded markets of physical and derivative commodity products including base metals. KMTL is not aware of major internal or external risks in relation to human trafficking/slavery in the trading of these commodities.

KMTL is committed to conducting all business lawfully and with integrity. KMTL'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 KMTL. KMTL'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.

Many of KMTL's commercial agreements require supplier compliance with applicable laws and regulation.

### **Supplier Audits**

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

### **Direct Supplier Certification**

Due to the perceived low risk, KMTL 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. 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. KMTL prohibits retaliation against anyone who, in good faith, raises a concern.

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

Due to the perceived low risk, KMTL 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, KMTL 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 Metal Trading Limited (KMTL).

This statement is made and reflects the position as of 18 June 2025, and has been approved by the Board of Koch Metals Trading Limited (KMTL).

Signed and dated in London, UK on 19 June 2025. Official copy may be available on request.