

BARTON PETROLEUM (HOLDINGS)LTD



Slavery and Human Trafficking Statement

Slavery and Human Trafficking Statement – BPL-v1

07/12/17

Classification: Public

Page 1

INTRODUCTION FROM RICHARD BURTON (MANAGING DIRECTOR)

BARTON PETROLEUM (HOLDINGS) LTD are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. To ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains we are enforcing effective systems and controls.

BARTON PETROLEUM (HOLDINGS) LTD are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Whether adults or children, we expect that our suppliers will hold their own suppliers to the same high standards.

The Directors are responsible for compliance in their respective departments and for their supplier relationships.

Slavery and Human Trafficking Statement

Slavery and Human Trafficking Statement – BPL-v1

07/12/17

Classification: Public

Page 2

OUR BUSINESS

BARTON PETROLEUM (HOLDINGS) LTD was formed in 1972. The company is a leading local distributor of petroleum fuels, lubricants. Products supplied to customers are not refined by the company, but are obtained from national suppliers who have their own established refineries.

The company has depots in Wellingborough, Leicester, Watford, Oakley (Bedford) and Moreton in Marsh and carries out works throughout the UK.

BARTON PETROLEUM (HOLDINGS) LTD provide services for a diverse range of clients, including many blue-chip organisations and procure products and services from a wide range of companies.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we have in place systems to:

1. Identify and assess potential risk areas in our supply chains;
2. Mitigate the risk of slavery and human trafficking occurring in our supply chains;
3. Monitor potential risk areas in our supply chains;
4. Protect whistle blowers.

All suppliers are required to complete Supplier Questionnaires which requires the supplier to provide details on management of Health and Safety, Environmental, Quality and general enquiries relating to the company for example, insurances, training, and competence amongst others. Prior to working for BARTON PETROLEUM (HOLDINGS) LTD all suppliers of labour resources are also required to provide proof of the right to work in the UK. The supplier questionnaire is designed to identify the risk to BARTON PETROLEUM (HOLDINGS) LTD and enable the company to determine if the risks are low or can be managed and controlled. Where labour only suppliers are contracted the need to provide proof of the right to work eradicates the risk of appointing someone illegally and allows the company to check on the labour supplier to ensure they are not involved in slavery and human trafficking.

We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. As part of the Supplier statement, all suppliers are asked to provide evidence of their due diligence or Statement in line with the Modern Slavery Act 2015.

Slavery and Human Trafficking Statement

Slavery and Human Trafficking Statement – BPL-v1

07/12/17

Classification: Public

Page 3

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors of BARTON PETROLEUM (HOLDINGS) LTD have received training on the subject and are aware of their legal responsibilities.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

1. Audits by our Quality Manager on compliance of our suppliers with our supplier requirements;
2. Use of labour monitoring and payroll systems;
3. Communication and personal contact with the next link in the supply chain and their understanding of, and compliance with our expectations.

FURTHER REVIEW

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2018. The Board will annually review the statement.

Richard Burton

Managing Director

Barton Petroleum (HOLDINGS) Ltd

7th December 2017