



Modern Slavery & Human Trafficking Statement

2025

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1 Introduction

Oil Brokerage Limited supports the fundamental principles of human rights and takes our obligations under the Modern Slavery Act 2015 very seriously. In addition to this, we are committed to operating in accordance with the International Bill of Human Rights and support fully the UN Guiding Principles and other internationally accepted standards, including the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

As a firm, we recognise that issues such as slavery, servitude, forced labour and human trafficking are a significant global challenge and exist in both developing and developed economies across all sectors.

Oil Brokerage Limited adopts a zero-tolerance approach to modern slavery and human trafficking, and all forms of corruption and bribery, directly and indirectly, associated with these criminal acts.

2 Our Organisation

Oil Brokerage Limited is an introducing broker that specialises in broking physical oil, oil derivatives refined products and physical shipbroking. Our company has clients in Europe, Africa, Asia and the Americas and can list international banks, oil majors, global trading houses and hedge funds amongst US customers.

We are headquartered in London and employ circa 200 employees. Further details of our structure and operations can be found in our [2024 Annual Report](#).

As a global company, we rely on nearly one hundred suppliers, the majority of which are leading global providers of IT, telecoms, market data, exchange / regulatory services and professional services.

3 Responsibilities and Accountabilities

Oil Brokerage Limited recognises that it is responsible for promoting ethical business practices and procedures that protect workers from being abused or exploited.

The prevention, detection and reporting of modern slavery in any part of Oil Brokerage Limited or its supply chain is the responsibility of all those working for us or on our behalf. Any employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

Therefore, this policy applies to all persons working for or on behalf of Oil Brokerage Limited, in any capacity, at all levels, including directors, seconded workers, and contractors.

4 Modern Slavery & Human Trafficking Framework

As part of our broad effort to integrate respect for human rights, Oil Brokerage Limited has a robust Modern Slavery and Human Trafficking framework in place. This framework includes policies on Anti-Money Laundering, Counter-Terrorist Financing, Business Continuity, Remuneration, KYC processes and compliance training.

Our compliance training is provided to all employees, where relevant to their line of business and function, on the following:

- The UK's anti-money laundering legislation including any changes in law and what is expected of staff to prevent financial crime. In addition, it will explain the consequences for them and for the firm if they fall short of that expectation;
- The risks that money laundering and terrorist financing pose to our firm and business;
- Our procedures for money laundering and terrorist financing prevention and our risk assessment strategy;
- The sanctions regime;
- The identity and responsibilities of the MLRO;
- Individual responsibilities in respect to the prevention and detection of money laundering; and

- The firm's procedures including suspicious activity reporting channels and record keeping requirements.

Oil Brokerage Limited warrants that it shall abide by the highest ethical standards in the performance of this framework, as well as not engaging in any fraudulent, corrupt, discriminatory or exploitative practice or practice inconsistent with the rights set forth in the Convention on the Rights of the Child.

5 Supply Chains

Oil Brokerage Limited is committed to implementing systems and controls aimed at ensuring that modern slavery and human trafficking is not taking place anywhere within the business or within our supply chains.

We hold our supplier community to high standards of business conduct and integrity. We conduct due diligence on all prospective suppliers, including negative news screenings, which covers a range of high-risk issues – such as modern slavery.

6 Non-Compliance, Reporting & Victim Support

If any employee, secondee or contractor of Oil Brokerage Limited is discovered to have breached this policy, then appropriate action will be taken; this may range from considering the possibility of breaches being remediated, to terminating agreements.

Individuals who have reasonable suspicion or evidence of non-compliance with regards to modern slavery and human trafficking with any member of Oil Brokerage Limited are encouraged to report their concerns to modernslaveryinfo@oilbrokerage.com.

Alternatively, if any employee of Oil Brokerage Limited holds information that could lead to the identification, discovery and recovery of victims of modern slavery or human trafficking in the UK are required to contact the Modern Slavery Helpline on 080 0012 1700 (open 24 hours a day, 365 days a year).

7 Policy Review

This policy will be reviewed on an annual basis, to establish whether Oil Brokerage Limited is conducting the best practice by assessing and interpreting any recent or emerging case law and principles and re-evaluating the risk of non-compliance as part of our annual risk management and assurance processes.



Steven Lane
Chief Financial Officer, Oil Brokerage Limited