

## **Kuwait Petroleum International Lubricants (U.K.) Limited**

### **Slavery and Human Trafficking Statement 2019-2020**

#### **Introduction**

Kuwait Petroleum International Lubricants (UK) Ltd (“the Company”, “Q8Oils UK”) is committed to ensuring that there are no acts of modern day slavery or human trafficking within our own operations or within our supply chains.

#### **About us**

Q8Oils UK is a subsidiary of Q8Oils. Q8Oils develops, blends and supplies lubricants and other petroleum derivatives globally mainly for automotive and industrial sectors. Q8Oils is a specialised subsidiary of the KPI Group of companies, which in turn is embedded within Kuwait Petroleum Corporation, Kuwait’s oil conglomerate (“KPC”).

#### **Structure and supply chains**

This Statement covers our direct operations and supply chains.

All group companies must comply with local legislation and regulations, and must conduct their activities in line with the KPC Code of Conduct, and our core values including integrity. We expect our contractors and suppliers to comply with applicable laws and the principles of the Code of Conduct.

Some of our suppliers may have their own supply chain and we encourage them to follow our expectations in relation to ethical business conduct.

#### **Policies on modern slavery**

In our Code of Conduct and related ethical business policies (including an anti-bribery policy, travel policy, employee handbook and others), and as further described in our sustainability report and CSR guidelines, the Company ensures that it provides a safe place to work. The Company will not support, condone or deal with any business knowingly involved in practices such as modern slavery forced labour and/or human trafficking.

#### **Due diligence processes**

As part of our supplier due diligence, Q8Oils has established supplier approval processes and procurement related processes which include a review of the controls undertaken by our suppliers. Contractual templates with suppliers include robust Modern Slavery provisions. We are also undertaking to update our safety walk checklists to cover identification of Modern Slavery risks. We have identified that products and services procured outside of the EU pose a higher risk for slavery and human trafficking issues. Senior management are aware of such risks and take greater care and scrutiny in relation to approving such suppliers.

#### **Risk assessment**

We will continue to assess and monitor the risk; however, the nature of our business means forced or involuntary labour is unlikely to occur within our own operations.

In relation to our supply chains, we have identified certain areas where scrutiny and monitoring is needed, like suppliers providing cleaning, catering and or facilities management services to our offices, particularly branches outside the EU, as well as any manufacturing and blending external facility outside the EU. Moreover, we have identified an increased risk when we face challenges to obtain copies of supplier’s compliance procedures, and their willingness to provide contractual assurances.

**Monitoring our effectiveness** Q8Oils directors and senior management will take the responsibility of implementing our policies and principles, and they will provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

We will regularly review the effectiveness of our policies and processes, and will continue increasing the awareness of our personnel.

### **Training**

It is vital that employees are made aware of the scale of modern slavery and the risks attached to it. Senior managers have been trained in the subject of Modern Slavery and have been involved in the due diligence process. From this training, it was identified that an industry specific training would be more beneficial. Subsequently a new bespoke training has been developed for all staff members in order to increase awareness. High-risk areas have been identified and employees are made aware on how to deal with potential labour rights and other modern slavery issues. All new joiners are required to complete an online training course, which introduces Modern Slavery.. All other staff have been made aware of the relevant Company policies and Statement.

This Statement will be reviewed annually and published on our website normally within 6 months of our financial year-end.



Catherine Macklam  
Director  
Q8Oils