



Kuwait Petroleum International Lubricants Limited  
Slavery and Human Trafficking Statement 23/24

The information in this Statement is made pursuant to the UK Modern Slavery Act 2015 ("the Act") and relates to the financial year ended 31 March 2024.

### **Introduction**

Kuwait Petroleum International Lubricants Limited ("the Company"), known by our trademark Q8, 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**

The Company and its affiliates are international subsidiaries of Kuwait Petroleum Corporation, Kuwait's national oil company ("KPC").

The Company has been dedicated since inception to market lubricants manufactured in the Group owned and managed blending plants in Antwerp (Belgium) and Castellar de Guidobono (Italy) as well as other locations where local blending is arranged. The Company is not directly engaged currently in business activities with customers due to organizational changes in the group.

### **Structure and supply chains**

This Statement covers our direct operations and supply chain activity. We have business relationships with customers and group companies and a few external suppliers in relation to lubes marketing.

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, which includes integrity. We expect our contractors and suppliers to comply with all applicable laws and the principles of the Code of Conduct.

Some of our suppliers may have their own supply chains 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, 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 slavery and/or human trafficking.

### **Due diligence processes**

The Company relies on established supplier approval processes and procurement related processes. We are asking potential suppliers to review and acknowledge the Code of Conduct.

We continue to update contractual templates, which are issued to our supply chain. We are also reviewing the insertion of provisions specifically referring to human trafficking legislation. We have identified that 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 actively monitor risk; however, forced or involuntary labour continues to remain unlikely within our own operations given we recruit and employ professional and technical specialists to carry out services.

In relation to our supply chain, we have identified that suppliers providing raw materials like base oil and additives may present a medium risk. We also anticipate increased risks where suppliers seem reluctant to share compliance procedures or provide contractual assurances.

### **Monitoring our effectiveness**

The Company's Legal and Compliance team is responsible for the various compliance and regulatory risks facing the Company. This team actively monitors, provides guidance and shares advice on a variety of topics including compliance with the Act. The Company's 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 regularly review the effectiveness of our policies and processes, and will continue increasing the awareness of our personnel. We are making progress with an internal standalone 'Modern Slavery Policy' and are considering publication.

### **Training**

Senior managers as well as key personnel have been trained in the subject of Modern Slavery and have been involved in the due diligence process and attending workshops. All other staff have been made aware of the relevant Company policies and Statement. We provide refresher online training and continue to investigate new ways to increase awareness.

This Statement will be reviewed annually and we aim to publish revisions on our website



David Wright  
Board of Directors of Kuwait Petroleum International Lubricants Limited