

## HELLENIC PETROLEUM CYPRUS LTD

### ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FY 2018

#### 1 INTRODUCTION

- 1.1 Hellenic Petroleum Cyprus Ltd (“**Company**”) is committed to preventing modern slavery and human trafficking from occurring within its business or supply chain and expects the same from its Suppliers and Vendors.
- 1.2 As slavery and human trafficking potentially can affect the energy business globally, the Company has a responsibility to take steps preventative of such illegal practices, in accordance with the Modern Slavery Act 2015 (“**MSA**”) and any other relevant legislation applicable to its activities.
- 1.3 Given the Company’s standing commitment in that regard, this statement includes not only the steps taken this year, but also initiatives the Company will pursue in the future. This statement will be published annually and include updates as appropriate.

#### 2 ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

- 2.1 The Company trades in petroleum products in Cyprus through a local branch. The Company manufactures and purchases the necessary assets and equipment to enable the company to sell these products. The Company works with a wide range of Suppliers and Vendors in several countries, including Greece, the United Kingdom, Israel, Italy, The Netherlands, Spain, Portugal, Slovenia, and Switzerland. The Company’s supply chains cover a number of businesses and jurisdictions.
- 2.2 The Company has reviewed and will continue to monitor its supply chains and business for modern slavery and human trafficking risks.

### **3 POLICIES AND PROCEDURES**

- 3.1 As part of the Company's commitment to combatting modern slavery and human trafficking we provide all Suppliers and Vendors with the Helpe Group Ethical Code (supplemented with an Addendum specific to modern slavery and human trafficking), the GDPR policy, and the Procurement and Credit policy of the Company.
- 3.2 We also expect our Suppliers and Vendors to implement policies to minimise the risk of modern slavery and human trafficking. The Company's policies have been developed following engagement with Suppliers and Vendors to determine any key risk areas, and procedures which can mitigate such risk.

### **4 DUE DILIGENCE**

- 4.1 We conduct periodic due diligence on all Company Suppliers and Vendors. All Suppliers and Vendors are required to provide a duly completed a Vendors and Suppliers Evaluation Form. Also, all Suppliers and Vendors receive and acknowledge in writing The Helpe Group Ethical Code (as supplemented).
- 4.2 Suppliers and Vendors which may be found to operate in environments or lines of business with a higher risk of slavery and human trafficking are subject to the above due diligence procedures, as well as additional targeted enquiries on a case by case basis.

### **5 RISK AND COMPLIANCE**

- 5.1 The Company annually evaluates the nature and extent of its exposure to the risk of modern slavery or human trafficking occurring in its business or supply chain by:
  - i) vetting Suppliers and Vendors;
  - ii) communicating the HelPe Group Code of Ethics (with MSA-specific Addendum); and
  - iii) monitoring Suppliers' and Vendors' legal status, solvency and compliance with Company policies.

### **6 TRAINING**

- 6.1 The Company believes in educating its staff to recognise and address modern slavery and human trafficking issues. As a result:
  - (a) All employees receive basic training on key concepts and relevant Company policies as part of their on-boarding process.
  - (b) Employees in supervisory and management positions, or responsible for conducting due diligence on Suppliers and Vendors, receive advanced

training in reporting and addressing modern slavery and human trafficking issues.

(c) Employees in audit positions receive advanced training on how to audit for these issues.

6.2 The Company is committed to ensuring that all personnel in key positions has received the appropriate level of training, and organises training sessions as appropriate.

6.3 The Company also expects that its Suppliers and Vendors train their staff on modern slavery and human trafficking issues. Wherever possible, new contracts contain provisions requiring Suppliers and Vendors to do so.

## **7 FURTHER STEPS**

7.1 The Company will continue to improve its internal policies and targets, as well as training materials and methods to guard against any slavery and human trafficking in its operations.

7.2 This Statement has been reviewed by the Company's Board of Directors, and the original copy of the Statement has been signed by a director in accordance with s54(6)(a) of the MSA.