

Modern Slavery & Human Trafficking Statement

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 in order to exploit them for personal or commercial gain.

Engelhart Commodities Trading Partners ("ECTP") is a commodities trading company with a presence in all major global commodities hubs. As a commodities trader that works extensively with partners and suppliers across the world, parts of ECTP's supply network may have the potential to be at risk of exposure to slavery and human trafficking. **ECTP has a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our corporate activities.** We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, legal and contractual obligations.

In furtherance of this commitment, ECTP has applied a risk-based approach in implementing various policies which require employees to conduct due diligence and to assess not only business risk but also social and human rights concerns, including that of modern slavery. These policies include:

Global Compliance Manual

All ECTP employees are required to read and acknowledge the ECTP Global Compliance Manual, which establishes the ECTP Principles of Business Conduct and Ethics. One of our core principles is that all staff should evaluate business risks taking human rights concerns into consideration.

In addition to being guided by the highest ethical standards and our own strict in-house compliance rules, we also:

- proactively cooperate with authorities and regulators to achieve and maintain optimal standards of risk management, respect, and transparency;
- periodically review policies and procedures, and offer internal training that reflects legal and regulatory requirements;
- perform the required diligence and monitoring ("Know Your Client") procedures;
- cultivate best industry practices, complying with the laws and regulations of the various jurisdictions where ECTP does business

Environmental, Social and Corporate Governance Policy ("ESG Global Policy")

ECTP operates under a consistent focus on the long term implications and results of our actions, prioritizing these long term benefits rather than short term gains, and consistently looking into Environmental, Social and Corporate Governance ("ESG") risks, and opportunities. We believe that sound business practices and corporate responsibility are long term drivers that must be applied daily to generate value through sustainable growth, attractive recurring revenue streams, and perennial business.

ECTP's ESG Policy sets forth ECTP's core ESG principles which include the fostering and protection of human rights with respect to business activities and in all stakeholder relationships, including our staff, partners, clients, shareholders, counterparties, authorities, and the society.

Commodities Conflict Minerals Policy

ECTP's Commodities Conflict Minerals Policy states our position regarding abuses associated with the extraction, transport, or trade of minerals. It reiterates that while sourcing from conflict-affected and high-risk areas, ECTP will not tolerate nor take any action to knowingly contribute to, assist with, or facilitate the commission by any part of, amongst other things, slavery or servitude and human trafficking.



Global Anti-Money Laundering / Counter-Terrorism Financing (AML/CTF), Sanctions, Embargoes, and Counterparty Identification Policies

Our AML Compliance Unit is responsible for implementing and managing the Counterterrorism and Anti-Money Laundering programs within ECTP. Working closely with the Onboarding department, the AML Compliance Unit 1) ensures that all new suppliers or counterparties, existing suppliers or counterparties and 2) any payments sent to or received from third parties are properly screened and not in violation of any applicable AML/CTF laws or regulations, sanctions or embargoes.

As part of the extensive financial and operational due diligence carried out before the approval of any supplier or counterparty, questions are asked about such supplier/counterparty's due diligence procedures, and whether the supplier/counterparty has a Business Code of Conduct, which includes ethical principles. In high-risk areas such as Brazil, we utilize government provided tools such as 'Transparency List on Contemporary Slavery in Brazil' in conducting our supplier/counterparty onboarding processes as well as in periodic existing counterparty/supplier reviews.

Our supplier contracts and onboarding documentation require all suppliers and counterparties to adhere to our policies and standards.

Global Whistleblowing policy

ECTP has a written policy and provides training to all employees on how to report any concerns related to the activities, or the supply chains of ECTP.

ECTP is committed to continuing to develop the understanding of the issues and mitigating the risks involved in slavery and human trafficking. To ensure to the best of our ability that high-risk sectors of our supply chain are free from slavery and human trafficking, we will continually review and improve our policies, processes, and controls.

Ongoing Efforts

Since the publication of our last Modern Slavery Statement, ECTP has begun the process of ensuring that new contract terms and conditions consistently include representations and warranties to ECTP that the counterparty will comply with all applicable anti-slavery and anti-human trafficking laws. ECTP plans to continue this process with the goal of having all supplier/counterparties contracts containing these representations and warranties.

In addition, ECTP's Compliance team has incorporated in its periodic business reviews questionnaires intended to identify potential risk exposure to human rights (including modern Slavery), environmental, corruption, and bribery and corresponding risk mitigants. ECTP Compliance also identifies and documents any memberships in trade or industry organizations supporting business ethics, sustainability, or fair trade goals.

This statement has been published pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes ECTP's slavery and human trafficking statement. It has been approved by ECTP's Board of Directors and will be reviewed annually.

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