

UK Modern Slavery Act Statement 2018-19

The information in this Statement is made pursuant to the UK Modern Slavery Act 2015 and relates to the financial year ended 31 March 2019.

Introduction

Kuwait Petroleum International Aviation Company (U.K.) Limited (“the Company”, “KPIAC 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.

The Company manages its operations with the services of a group company, Kuwait Petroleum International Aviation Company Limited (“KPIAC”). This statement applies equally to that Company and their operations, throughout.

About us

KPIAC UK supplies and markets aviation jet fuel predominantly to airlines at airports across the U.K. KPIAC supplies services to group companies around the world, including KPIAC UK. They both form part of the specialised aviation business of the group’s ultimate parent, Kuwait Petroleum Corporation, Kuwait’s national oil company (“KPC”).

KPIAC UK is also involved in a number of joint venture enterprises on airports together with other fuel suppliers.

The Company purchases the fuel from international oil companies and related parties and receives services in relation to the distribution and delivery to customers of the Jet Fuel to airport locations.

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 slavery and/or human trafficking.

Due diligence processes

As part of our supplier due diligence, the Company has established supplier approval processes and procurement related processes which include a review of the policies undertaken by our suppliers. Contractual templates with suppliers have been updated to 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 or our joint venture, operations.

In relation to our supply chains, we have identified that suppliers providing products or services from outside the EU present a higher risk. 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

The Group's Compliance Committee reporting directly to the CEO is responsible for the various compliance and regulatory risks facing the Company. This team is tasked with disseminating advice and providing guidance to OU's on a variety of topics including Modern Slavery. 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 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 and attending workshops. 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 specifically within the aviation business. 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 includes modules that introduce what Modern Slavery is, as well as more specific modules to the risks of modern slavery within the aviation business. 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.



Naser Ben Butain

Director and General Manager

For and on behalf of the Boards of Directors of:

Kuwait Petroleum International Aviation Company (U.K.) Limited