

## **Kuwait Petroleum International Aviation Company (U.K.) Limited Slavery and Human Trafficking Statement 2023-24**

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 Aviation Company (U.K.) Limited ("the Company") 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.

Kuwait Petroleum International Aviation Company Limited ("KPIAC") provides management services to the Company. This statement applies equally to KPIAC and their operations, throughout.

### **About us**

The Company is part of the Kuwait Petroleum International group of companies ("Group"), which is known by the trademark "Q8", and which is ultimately owned by Kuwait Petroleum Corporation, Kuwait's national oil company.

The Company supplies and markets aviation jet fuel predominantly to airlines at UK airports, and to more than 70 international airports. The Company is also a shareholder in several joint venture enterprises at airports together with other fuel suppliers.

The Company purchases aviation jet fuel from international oil companies and commodity traders and procures services in relation to the distribution and delivery of the fuel to airlines at agreed airport locations.

### **Structure and supply chains**

The Company has activities in multiple countries across Europe, Asia and Australia.

This Statement covers our direct operations and supply chain activity. We have business relationships with local and international airlines, logistics companies, freight forwarders and Group companies. We also have local agreements for professional services in relation to consultancy, training, advisory and management services.

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

The Company will not support, condone or deal with any business knowingly involved in practices such as modern slavery and/or human trafficking.

### **Policies on modern slavery**

The Company conducts, and expects its counterparties to conduct, their activities in line with the [Code of Conduct](#) (or equivalent) 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](#).

Our parent company has recently rolled out an internal 'Modern Slavery Policy' which will be adapted and incorporated in our own business management system.

### **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](#).

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Our standard contractual templates with suppliers have been updated to include robust modern slavery provisions.

We have also updated our safety walk checklists to cover identification of modern slavery risks.

### **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: we operate in a highly regulated, technically sophisticated and specialised area of the aviation industry.

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.

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 a supplier's compliance procedures, and their willingness to provide contractual assurances. We continue to actively monitor these risks.

### **Monitoring our effectiveness**

The Company's legal officer reports directly to the Managing Director and is responsible for the various compliance and regulatory risks facing the Company. The legal officer is also supported by Group Legal and Compliance resources, and has access to external advisors.

The Company's directors and senior management take the responsibility of implementing our policies and principles, and they provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

The Group operates a safe and confidential reporting system with a whistleblowing hotline and online reporting tool which allows Group employees to speak up and report any concerns to senior management. We are looking at raising internal awareness to this tool and widening access to third parties.

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

### **Training**

Senior managers have been trained in the subject of modern slavery and have been involved in the due diligence process and attending workshops.

We also identified that an industry specific training would be beneficial. Accordingly, a new bespoke training has been developed for all employees in order to increase awareness specifically within the aviation business. High-risk areas have been identified and employees are made aware of 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. Existing employees have been made aware of the relevant Company policies and this Statement.

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

A handwritten signature in blue ink, appearing to read "Naser Ben Butain".

**Naser Ben Butain**

**For and on behalf of the Board of Directors of:  
Kuwait Petroleum International Aviation Company (UK) Limited**