



Modern Slavery Act Statement

This statement is made under section 54 of the [Modern Slavery Act 2015](#) (*the Act*) and sets out the steps that Longulf Trading UK Limited took during our financial year ended 31.12.2018 to ensure that slavery and human trafficking does not occur anywhere in our supply chain or in any part of our business.

This statement will be reviewed and updated annually.

Organisational structure and business

Longulf is a UK incorporated business headquartered in London with offices in India, China, Germany, Slovakia, Turkey, Egypt, Morocco, Kenya, and Ethiopia.

Longulf focuses on providing supply services to our clients and business partners to support transactions between Europe, North America, Asia, the Middle East and North Africa region (MENA) in the following core business areas:

- Food and Non-Food raw materials for use in manufacturing industry
- Plant, equipment and spare parts

As a materials and equipment provider Longulf has a relatively straightforward supply chain. Our key suppliers include multinational and leading manufacturers of raw materials, capital equipment and proprietary spare parts.

Policies and controls

Longulf is committed to acting honestly, ethically and with integrity in all our business relationships and we expect our suppliers to share those values. Longulf is fully supportive of the principles underlying the Act and will not knowingly support or conduct business with any suppliers who are involved in slavery or human trafficking. Longulf has conducted a preliminary assessment of our internal policies and controls and identified those which are relevant to assisting in the prevention, detection, management and reporting of slavery and human trafficking in our supply chain and across our business. These include policies or controls relating to:

- Reputational risk
- Supplier / third party management
- Whistleblowing
- Anti-Bribery and Corruption.

Each of the relevant policies is reviewed at least annually and as part of the review cycle will be further enhanced as appropriate in accordance with the principles of the Act.

Longulf does not believe there is a high risk of slavery or human trafficking occurring in its supply chain. We therefore operate a risk-based approach to reviewing suppliers who may carry a higher risk in this respect. We have enhanced our supplier and third-party management framework with a Supplier Code of Conduct affirming our commitment to combatting slavery and human trafficking in our supply chain. We are implementing this alongside other regulatory changes and review all contractual arrangements during 2018 and updating where appropriate.

Effectiveness

We will regularly review the following to assess our effectiveness in relation to the steps taken to ensure slavery and human trafficking is not taking place in our business or supply chain:

- Risk-based checks against our Supplier Code of Conduct and any relevant provisions in our contracts with suppliers
- Monitoring relevant reporting through our Whistleblowing Policy
- Risk-based compliance monitoring of adherence to relevant policies and procedures, including supplier due diligence procedures.

Training

Longulf recognises the importance of raising awareness in this area. We want our people to understand more about this serious issue and how to report any suspicions they may have, whether in business or personal context.

We already have in place a whistleblowing policy and helpline which ensures that anyone with concerns has a means of raising them confidentially. The policy supports employees in reporting any suspicions regarding modern slavery and our employees have been signposted to this in our communications alongside the Modern Slavery website.

Going forward we aim to work towards an in house training module that will be undertaken by all Longulf Employees. This training will outline what modern slavery is, how to identify it and what individuals should do if they suspect there are any cases of slavery occurring. Completion of this training will form a compulsory part of our new starter induction process.

Longulf uses only reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting labour from that agency. Where we recruit candidates directly we have robust recruitment processes in line with UK employment laws, including right to work document checks: contract of employment and checks to ensure everyone employed is 16 and above.

Board Approval

This statement has been reviewed by Longulf senior management and was approved by The Longulf Board of Directors on 16th May 2019

Signed on behalf of the Board of Directors of Longulf Trading UK Limited



Dirhem Abdo Saeed
Managing Director