



SEFE Energy Limited

Slavery and Human Trafficking Statement

Background

This is SEFE Energy Limited's ("SEFE Energy") statement on slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery 2015 ("Act") for the financial year ending on 31 December 2023.

SEFE Energy is fully committed to ensuring that it complies with all applicable legal requirements, including without limitation the Act.

Our business

SEFE Energy employs over 300 people worldwide and has business operations in the United Kingdom, France and the Netherlands.

SEFE Energy is a subsidiary company of SEFE Marketing and Trading Limited, forming part of the SEFE Group ("SEFE Group") of companies, and implements all SEFE Group policies.

Our policy on slavery and human trafficking

SEFE Energy fully supports the aims of the Act. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to endeavour to ensure that slavery and human trafficking is not taking place anywhere in our business or supply chains.

Our processes to prevent slavery and human trafficking

SEFE Energy has taken the following action to ensure the prevention of modern slavery and human trafficking:

1. Prepared a revised and consolidated SEFE Group Code of Ethics & Business Conduct which requires staff to, amongst other things, uphold our commitment to acting ethically and with integrity in all our business relationships, and clearly states the company's commitment to combating modern slavery and human trafficking.
2. Implemented a comprehensive Compliance Management System, managed by the Legal & Compliance department, which assigns responsibility for varying ethics and compliance topics to respective 'responsible functions' within the company. Human Rights, Social and Labour Standards are addressed by the Compliance Management System.

3. Refreshed and reintroduced a SEFE Group whistleblowing telephone hotline and web portal to facilitate the making of anonymous whistleblowing reports, and appropriate underlying whistleblowing investigation and handling procedures to provide adequate protection for whistleblowers, should anyone wish to make a report related to modern slavery and human trafficking.
4. Introduced a 'Environmental, Social and Governance' team which along with a program of supporting work has published the company's first 'Action Plan for a Sustainable Future'.

As part of our commitment to combating modern slavery, SEFE Energy will be taking the following steps:

1. Continue reviewing the various parts of our business to ensure no slavery or human trafficking takes place in any part of our business or the supply chains.
2. Reinforcing the message of the united SEFE Code of Ethics & Business Conduct, and continue to review and improve underlying processes and policies to identify how we can try to ensure that no slavery or human trafficking takes place within any part of our business or the supply chains.
3. Continue to incorporate appropriate anti-slavery and human trafficking provisions into our procurement and third party supplier contracts on a risk assessed basis.
4. Continue monitoring potential risk areas in our supply chains, as part of our periodic business-wide risk assessment.

SEFE Energy will continue to review our procedures in relation to the prevention of slavery and human trafficking in our business and supply chains.

A new statement will be published each year on the corporate website <https://www.sefe-energy.co.uk>

This Statement was approved by the Board of Directors of SEFE Energy Limited on 22 May 2024 and signed by Mark Eccles (Director) on 22 May 2024.
