

# Exolum Pipeline System Modern Slavery and Human Trafficking Statement

Version 1

31st April 2021



This Statement made by Exolum Pipeline System Ltd (Formerly trading as CLH Pipeline System Ltd in the relevant period) is in accordance with the Modern Slavery Act (MSA) 2015.

## 1. Introduction

Modern Slavery and human trafficking are completely unacceptable in modern society and business plays an important role in tackling them. Exolum Pipeline System fully support the principles of the Modern Slavery Act and takes a zero-tolerance approach to modern slavery and human trafficking in our operations and supply chain.

This statement outlines the steps taken during the 2020 financial year and our future plans to prevent slavery and human trafficking taking place in any part of our business or in any of our supply chains.

## 2. About Exolum Pipeline System

Exolum Pipeline System is an oil product logistics company and owns, manages and operates the pipeline system network across the UK. We are a subsidiary of Exolum Group which is based in Spain. Our mission is 'to solve the logistics needs of our customers by applying the latest technologies to provide them with the most efficient and reliable solutions in a safe and environmentally responsible manner'. Our financial year ends on 31st December.

Our Values within Exolum play an integral part in delivering our service. Ethics play a key role in every aspect of the business and enables us to achieve our Vision which is 'To be regarded as the number one global infrastructure company in terms of innovation, responsibility and sustainability by our colleagues and customers'.

In November 2020 Exolum Group acquired Inter Terminals to become the leading bulk liquid logistics company in Europe. During 2021 we will align our policies to ensure we continue to support the principles of the Modern Slavery Act and our supply chains continue to be the focus in relation to modern slavery and human trafficking.

## 3. Our Policies

Exolum Pipeline aims to provide an environment that it is inclusive, rewarding and enable our colleagues to play an important part in the development of our business. We operate several internal policies/processes to ensure that we are conducting business in an ethical and transparent manner. These include:

- **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- **Whistleblowing policy.** We operate a whistleblowing policy so that all colleagues know that they can raise concerns about how team members are being treated, or practices within our business or supply chain, without fear of reprisals.
- **Bullying & Harassment Policy.** Emphasising that this type of behaviour will not be tolerated, we outline how we will investigate and deal with any allegations.
- **Fraud Policy.** We outline the steps we take to reduce the opportunity for fraud and what action to take in suspected cases.
- **Anti-Bribery & Corruption Policy.** This document describes how we approach gifts and offers of hospitality to avoid opportunities for and allegations of bribery and corruption.
- **Near miss reporting.** This reporting is for individuals who have witnessed near miss incidents and any unsafe acts.

- **Code of Conduct.** Exolum Group have put into place processes for reporting violations of the law or non-compliance with the Groups Code of Conduct. In order to ensure our team members understand and comply with policies that govern working at Exolum Pipeline System, we ask everyone as part of their induction to read through our mandatory Code of Conduct. All new colleagues as part of our onboarding process are asked to read and sign to say they are committed to working within the Code of Conduct

#### 4. **Our Suppliers**

Exolum Pipeline System keeps the risks on ethical conduct in our supply chain under review. To ensure our supply chain reflects our values, ethics and code of conduct during our sourcing processes we include due diligence measures through the Achilles UVBD and/or our pre-qualification questionnaires.

In 2021/22 we will be incorporating into our new SAP/Ariba system a Code of Conduct statement which will incorporate requirements under the Modern Slavery Act as part of the onboarding process of Suppliers.

Our standard procurement and contract documentation are continually reviewed and enhanced where necessary to ensure they address anti-slavery and anti-trafficking.

#### 5. **Training**

As we anticipate the highest risk area to be our supply chain, we continually review the training of all key colleagues whose roles include involvement in our supply chain to ensure they are continually aware of the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. All our colleagues know that they should raise any suspicions around instances of modern slavery or human trafficking to their manager.

Any new colleagues are briefed on our stance on modern slavery when they join us and we are continuing to roll out e-learning to the wider workforce during 2021.

#### 6. **Previous Incidents**

There were no reported incidents of Modern Slavery or Human Trafficking in Exolum Pipeline System Ltd or, to the best of our knowledge, in our supply chain during the 2020 financial year.

Approved on behalf of the Exolum Pipeline System Ltd Board:



**Nacho Casajus**

**CEO**

30th April 2021