

# Exolum Terminals Ltd Modern Slavery and Human Trafficking Statement

Version 1

18 May 2021



This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Exolum Terminals Ltd (formerly trading as Inter Terminals Ltd in the relevant period) and its subsidiaries incorporated in England and Wales for the financial year ended 31 December 2020.

## 1. Introduction

Modern Slavery and human trafficking are completely unacceptable in modern society and business plays an important role in tackling them. Exolum Terminals 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 Terminals

In November 2020, Inter Terminals Ltd was acquired by CLH Group to become the leading bulk liquid logistics company in Europe. In March 2021 the business was rebranded as Exolum. Exolum Terminals has a number of UK Subsidiaries<sup>1</sup>, owning and operating oil and chemical terminals that supply bulk liquid storage services in the UK. Our mission is that ‘We are a company focused on infrastructure management, using the latest technology to provide our customers with the most efficient and reliable solutions, always safe and environmentally responsible.’

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’.

During 2021, our focus will be aligning our policies within the expanded business to ensure that we continue to support the principles of the Modern Slavery Act and be alert to the risks posed by modern slavery and human trafficking in our supply chains.

## 3. Our Policies and Procedures

Policies and procedures are crucial for developing anti-slavery and anti-trafficking standards across our business, which will influence the decisions of our colleagues and suppliers. Exolum Terminals have a number of Policies and Procedures in place that reinforce our zero-tolerance approach to modern slavery and human trafficking.

- **Recruitment processes.** We operate a robust recruitment process, which includes conducting checks on candidate’s eligibility to work in the UK, to safeguard against human trafficking or individuals being forced to work against their will.
- **Code of Conduct.** Exolum Group have developed a Code of Conduct that outlines the behaviours we expect of all our colleagues at work, which includes compliance with all laws and treating people with dignity and respect. In order to ensure our colleagues understand and comply with the Code, all colleagues are required to read through the Code and confirm that they are committed to compliance with the Code. Compliance with the Code is monitored by the Ethics Committee.

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<sup>1</sup> Exolum Eastham Ltd, Exolum Grangemouth Ltd, Exolum Immingham Ltd, Exolum Riverside Ltd, Exolum Seal Sands Ltd, Exolum Storage Ltd, Exolum Tyneside Ltd.

- **Whistleblowing Policy.** We operate a Whistleblowing Policy so that all colleagues know that they can raise concerns about the treatment of people, or practices within our business or supply chain, without fear of reprisals.
- **Contractor and Supplier selection processes (Control, Selection and HSE Review, and Invitation to Tender Template).** All contractors and suppliers of goods and services to Exolum Terminals must be on our Approved Contractor / Supplier Lists, which requires the completion of a Modern Slavery and Human Trafficking Declaration. Contractors and suppliers must demonstrate compliance with the Modern Slavery Act to be included on these approved lists.

#### 4. Our Suppliers

We are committed to ensuring that there is no modern slavery or human trafficking in our business in the UK and to reducing the risk of modern slavery or human trafficking in the supply chain of our business in the UK, whether the supply chain is within or outside the UK. Our supply chains continue to be predominantly comprised of goods and services supplied to our business by other UK based businesses. We perceive our supply chains as broadly low risk, save in relation to construction and maintenance contractors.

To further reduce the risk of modern slavery and human trafficking in our supply chain we undertake due diligence prior to accepting contractors and suppliers on our Approved Contractor / Suppliers Lists, through the completion of a Modern Slavery and Human Trafficking Declaration that demonstrates compliance with the Modern Slavery Act. Our contractor and supplier selection processes are continually reviewed and enhanced where necessary to ensure they address anti-slavery and anti-trafficking.

#### 5. Training

All colleagues at Exolum Terminals Ltd must undertake Modern Slavery and Human Trafficking awareness training to ensure that they are aware of the signs of modern slavery and understand what to do if they suspect that it is taking place within our supply chain. All colleagues are trained to know that they should raise any suspicions around instances of modern slavery or human trafficking to their manager.

#### 6. Activity over the Financial Year

At the end of 2020, more than 99% of our own workforce in the UK was comprised of salaried employees. We continue to exercise due diligence through vetting all contractors who supply on-site construction and maintenance related services to our business in the UK and other major suppliers for compliance with the Modern Slavery Act. We continued to remain alert to any potential changes to the risks of modern slavery in our business and ensured that colleagues had sufficient awareness of those risks through the rollout of e-learning, so that such risks can be minimized, and concerns reported and acted upon. At the time of signing more than 93% of colleagues had completed the modern slavery and human trafficking training. There were no reported incidents of Modern Slavery or Human Trafficking in Exolum Terminals Ltd or, to the best of our knowledge, in our supply chain during the 2020 financial year.



**Nacho Casajus**  
**CEO**

Approved on behalf of the Exolum Terminals Ltd Board on 20 May 2021