

BB Energy Trading Ltd.

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ANTI-SLAVERY STATEMENT

This statement is made by BB Energy Trading Ltd (“we” or “us”) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

The board and management of BB Energy Trading Ltd has a zero tolerance policy to modern slavery, human trafficking and forced labour. We are opposed to all forms of modern slavery and we are committed to acting fairly, professionally and with integrity in all our business dealings.

Our Company and business:

Our group is one of the world's leading independent energy trading companies. For over four decades we have been applying our depth of specialist experience to oil refining, logistics, storage and financing across the world, and today our trading activities span across the five continents internationally. Within the group BB Energy Trading Ltd covers many of the regional activities of the group in Europe and North America.

Our activities include trading, blending, refining, transporting and storage of crude oil, petroleum products, and other commodities. Our trading counterparties include national oil and gas companies, international and multinational trading and energy companies, leading industrial and chemical companies, as well as other companies.

Our policies:

As part of our commitment to combatting modern slavery, we are in the process of implementing various procedures and policies. Our activities in this area include the following steps:-

- We are preparing an internal Anti-Slavery Policy which applies to all those working for us or on our behalf.
- We are reviewing our existing policies and procedures to identify any changes which might be needed.
- We are in the process of identifying policies and procedures which set out our approach to due diligence on our potential and existing business operations, business partners and suppliers.

Training:

Over the course of the next financial years we will be reviewing relevant training courses to provide to relevant members of staff to ensure that employees understand the risks of modern slavery, human trafficking and forced labour in our business and supply chains, to encourage employees to be vigilant and aware in their dealings with suppliers and customers and to ensure that employees know how to report any concerns.

Risk Assessment and Due Diligence:

Over the course of the next financial year we intend to carry out a preliminary analysis of our supply chain in order to:-

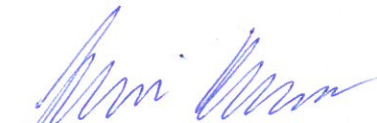
- inform our approach to supplier due diligence;
- develop appropriate systems to ensure that we engage appropriately with suppliers;
- identify our approach to communicating with suppliers to raise awareness of the Modern Slavery Act 2015 and our stance and approach.

Measuring effectiveness:

We plan to review and build upon the progress that we are making (and take any necessary subsequent action) by:

- Reviewing the effectiveness of our Anti-Slavery Policy
- Developing our supplier risk assessment and due diligence process to ensure that we engage appropriately with suppliers.

Signed: 15 DECEMBER 2017



Director

BB Energy Trading Ltd