

EKO CYPRUS LIMITED

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FY 2023

1 INTRODUCTION

- 1.1 This statement is made on behalf of EKO CYPRUS LIMITED (the “**Company**”) with respect to the financial year ending December 2023.
- 1.2 The Company is incorporated in the United Kingdom.
- 1.3 The Company is committed to preventing modern slavery and human trafficking from occurring within its business or supply chain and expects the same from its Suppliers and Vendors.
- 1.4 We recognize that modern slavery and human trafficking can affect the energy business globally, the Company has a responsibility to take steps to prevent such illegal practices, in accordance with the Modern Slavery Act 2015 (“**MSA**”) and any other relevant legislation and regulations applicable to its activities.
- 1.5 Given the Company’s standing commitment in that regard, this statement includes the steps taken this year, together with the Company’s further steps that will be pursued in the future. This statement will be published annually and include updates as appropriate.

2 ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

- 2.1 The Company trades in petroleum products in Cyprus through a local branch under the name EKO CYPRUS LIMITED. The Company manufactures and purchases the necessary assets and equipment to enable the Company to sell these products. It is a member of the HELLENiQ Energy Group.
- 2.2 The Company works with a wide range of Suppliers and Vendors in several countries, including Greece, the United Kingdom, Israel, Italy, The Netherlands, Spain, Portugal, Slovenia, and Switzerland. The Company’s supply chains cover a number of businesses and jurisdictions.
- 2.3 The Company requires its direct Suppliers and Vendors to comply with applicable laws and regulations, which include applicable slavery/human trafficking laws. The Company is committed to addressing situations that we become aware of involving any Supplier or Vendor breaching applicable laws, including concerning modern slavery and human trafficking.
- 2.4 The Company has reviewed and will continue to monitor its supply chains and business for modern slavery and human trafficking risks.

3 POLICIES AND PROCEDURES

- 3.1 As part of the Company's commitment to combatting modern slavery and human trafficking, it adheres to the Group's Code of Business Conduct as well as the Company's Anti-Slavery and Human Trafficking Statement, GDPR policy and Procurement and Credit policy.
- 3.2 The Group's Business Conduct sets the ethical and professional standards for all employees who are required to comply with applicable laws and regulations in the countries where Group has a presence.
- 3.3 We also expect our Suppliers and Vendors to implement policies to minimise the risk of modern slavery and human trafficking, and each are provided with a copy of the Group's Code of Business Conduct, the GDPR policy and the Procurement and Credit policy of the Company. The Company's policies have been developed following engagement with Suppliers and Vendors to determine any key risk areas, and procedures which can mitigate such risk.

4 DUE DILIGENCE

- 4.1 We conduct periodic due diligence on all Company Suppliers and Vendors. All Suppliers and Vendors are required to provide a duly completed Vendors and Suppliers evaluation form. Also, all Suppliers and Vendors receive and acknowledge in writing the Group's Code of Business Conduct.
- 4.2 Suppliers and Vendors which may be found to operate in environments or lines of business with a higher risk of slavery and human trafficking are subject to the above due diligence procedures, as well as additional targeted enquiries on a case by case basis.

5 RISK AND COMPLIANCE

- 5.1 The Company annually evaluates the nature and extent of its exposure to the risk of modern slavery or human trafficking occurring in its business or supply chain by:
 - i) vetting Suppliers and Vendors;
 - ii) communicating the Group's Code of Business Conduct; and
 - iii) monitoring Suppliers' and Vendors' legal status, solvency and compliance with Company policies.

6 TRAINING

- 6.1 The Company believes in educating its staff to recognise and address modern slavery and human trafficking issues. As a result:
 - (a) All employees receive basic training on key concepts and relevant Company policies as part of their on-boarding process;
 - (b) Employees in supervisory and management positions, or responsible for

conducting due diligence on Suppliers and Vendors, receive advanced training in reporting and addressing modern slavery and human trafficking issues; and

(c) Employees in audit positions receive advanced training on how to audit for these issues.

6.2 The Company is committed to ensuring that all personnel in key positions have received the appropriate level of training, and organises training sessions as appropriate.

6.3 The Company also expects that its Suppliers and Vendors train their staff on modern slavery and human trafficking issues. Wherever possible, new contracts contain provisions requiring Suppliers and Vendors to do so.

7 FURTHER STEPS

7.1 The Company will continue to improve its policies, processes and practices , as well as training materials and methods to guard against any modern slavery and human trafficking in its operations.

7.2 This Statement has been reviewed by the Company's Board of Directors, and the original copy of the Statement has been signed by a director in accordance with s54(6)(a) of the MSA.



Georgios Gregoras

Director

For and on behalf of the Board of Directors

Eko Cyprus Limited