

## **Gazprom Marketing & Trading Retail Limited**

### **Slavery and Human Trafficking Statement**

#### **Background**

This is Gazprom Marketing & Trading Retail Limited's ("GMTR") statement on slavery and human trafficking following the introduction of the Modern Slavery Act 2015 ("Act"). This statement is made pursuant to section 54(1) of the Act for the financial year ending on 31 December 2018.

GMTR is fully committed to ensuring that GMTR complies with all applicable legal requirements including without limitation the Act.

#### **Our business**

GMTR employs over 300 people worldwide and has business operations in Manchester, Paris and the Netherlands.

GMTR is a subsidiary company of Gazprom Marketing & Trading Limited ('GM&T Group') and implements all GM&T Group policies.

#### **Our policy on slavery and human trafficking**

GMTR 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 chain.

#### **Our processes to prevent slavery and human trafficking**

GMTR has undertaken the following activities to ensure the prevention of human trafficking:

1. Updated, maintained and promoted the GM&T Group Code of Conduct, which requires staff to, amongst other things, uphold GMTR's commitment to acting ethically and with integrity in all our business relationships and clearly states GMTR's commitment to combating modern slavery and human trafficking.
2. Reviewed and improved global suite of our policies and procedures, which require staff to, amongst other things, uphold GMTR's commitment to acting ethically and with integrity in all our business relationships.
3. Established a GM&T 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.

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

1. As a part of a wider group risk assessment, continue a review of the various parts of our business to ensure no slavery or human trafficking takes place in any part of our business or the supply chain.
2. Continue to maintain and promote GM&T Group Code of Conduct and continue to review and improve our 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 chain.
3. Incorporating appropriate anti-slavery and human trafficking provisions into our procurement and third party supplier contracts on a risk assessed basis.
4. Monitoring potential risk areas in our supply chain, as part of our periodic business-wide risk assessment.

GMTR will continue to review our procedures in relation to prevention of slavery and human trafficking in our business and supply chain.

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

This Statement was approved by the Board of Directors of Gazprom Marketing & Trading Retail Limited on 30<sup>th</sup> June 2019



Kurt Pedersen, Director

Date : 01/07/2019