

# Kuwait Petroleum International Limited Slavery and Human Trafficking Statement 2021-22

The information in this Statement is made pursuant to the UK Modern Slavery Act 2015 (the "Act") and relates to the financial year ended 31 March 2022.

#### Introduction

Kuwait Petroleum International Limited (the "Company"), known by our trademark Q8, is committed to ensuring that there are no acts of modern day slavery or human trafficking within our own operations or within our supply chains.

#### About us

The Company is an international subsidiary of Kuwait Petroleum Corporation, Kuwait's national oil company ("**KPC**").

The Company provides management and consultancy services to affiliates and subsidiaries ("group companies"). The Company performs activities in three main locations: UK, Netherlands and Kuwait. The Company is not directly engaged in business activities with external customers.

## Structure and supply chains

This Statement covers our direct operations and supply chain activity. We have business relationships with group companies and a few external suppliers in relation to consultancy, training, advisory and management services.

All group companies must comply with local legislation and regulations, and must conduct their activities in line with the KPC Code of Conduct and our core values, which includes integrity. We expect our contractors and suppliers to comply with all applicable laws and the principles of the Code of Conduct.

Some of our suppliers may have their own supply chains and we encourage them to follow our expectations in relation to ethical business conduct.

#### Policies on modern slavery

In our Code of Conduct and related ethical business policies, and as further described in our sustainability report and CSR guidelines, the Company ensures that it provides a safe place to work. We have recently finalised a specific 'Modern Slavery Policy' which will be published on our business management system. The Company will not support, condone or deal with any individual(s) or business(es) knowingly involved in practices such as slavery and/or human trafficking.

## Due diligence processes

The Company relies on established supplier approval processes and procurement related processes. We also require potential suppliers to review and acknowledge the Code of Conduct.

In Kuwait, the government grants licences to local companies who meet set qualification criteria, which allows them to operate. The Kuwait oil sector also provides minimum labour and welfare conditions for personnel, which KPI strongly supports. The Company believes that these verification processes and checks significantly reduce the risk of the Company contracting with unscrupulous suppliers.

We continue to identify janitor services generally and non-professional services procured outside of the UK and EU as posing a greater risk for slavery and human trafficking issues. Senior management are aware of this risk assessment and take greater care and scrutiny in relation to approving suppliers working in these sectors.

### Risk assessment

We still consider forced or involuntary labour as unlikely within our own operations given we recruit and employ professional and technical specialists to carry out management services.

In relation to our supply chain, we have identified that suppliers providing cleaning, catering and or facilities management services to our offices, particularly branches outside the UK and EU present a higher risk. We also anticipate increased risks where suppliers seem reluctant to share compliance procedures or provide contractual assurances. We continue to actively monitor these risks.

## Monitoring our effectiveness

The Company's Legal Compliance Committee, reporting directly to the Chief Executive Officer, is responsible for the various compliance and regulatory risks facing the Company. This team actively monitors, provides guidance and shares advice on a variety of topics including compliance with the Act. The Company's directors and senior management take the responsibility of implementing our policies and principles, and they will provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation and its supply chains.

We have recently entered into a third-party contract for the provision of a safe and confidential reporting system. Our whistleblowing hotline and online reporting tool allows employees to speak up and report any concerns to senior management. We have received no reports in relation to slavery or human trafficking concerns.

We regularly review the effectiveness of our policies and processes, and will continue increasing the awareness of our personnel.

# **Training**

Senior managers as well as key personnel in our Kuwait head office, have been trained in the subject of Modern Slavery and have been involved in the due diligence process and attending workshops. All other staff have been made aware of the relevant Company policies and Statement. We provide refresher online training and continue to investigate new ways to increase awareness. Face to face training has not been possible for the reporting year due to the impact of COVID-19 and reduced office attendance.

This Statement will be reviewed annually and published on our website normally within 6 months of our financial year-end.

Waleed Al Ben Ali

**Acting President and CEO** 

For and on behalf of the Board of Directors of Kuwait Petroleum International Limited