



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

### 1. Introduction

This statement sets out Aztec Oils Ltd actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our own business and our supply chains. This statement relates to actions and activities during the current financial year. We are absolutely committed to preventing slavery and human trafficking in our business activities, and to ensuring that our supply chains are free from slavery and human trafficking.

### 2. Organisational structure and supply chains:

We supply and deliver Lubricants to the commercial sector. Aztec Oils Ltd currently operate in the following location(s):

- Aztec Oils, Bolsover, Chesterfield, S44 6BB
- Northern Oils, Buckie, United Kingdom, AB56 4BB

### 3. Our supply chains

Our supply chains include the sourcing of Lubricants related to the Oil Industry. We expect all those in our supply chain to comply with our Zero tolerance approach to slavery and human trafficking. Suppliers are required to demonstrate that they act ethically and within the law in their use of labour. Where suppliers are unable to demonstrate this standard, we will look to terminate the business relationship. The company directors are responsible for compliance in their respective departments and for their relationships.

### 4. Relevant Steps

We operate the following policies and procedures to identify modern slavery risks and prevent slavery and human trafficking in its operations:

- ***Whistleblowing policy***

We encourage all our workers, customers, and other business partners to report any concerns related to the direct activities, or the supply chains of, the company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for individuals to make disclosures, without fear of retaliation.

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- ***Business Ethics Policy***

The Company's code makes clear to employees the actions and behaviour expected of them when representing the Company. We strive to maintain the highest standards of employee conduct and ethical behaviour when managing our supply chain.

- ***Code of Conduct***

Our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

- ***Recruitment and use of agency staff***

When we recruit staff, we ensure that all potential employees have the legal right to work in the UK and that relevant employment legislation is adhered to. If we use only specified, reputable employment agencies to source labour and always verify the practices of any new agency we use using before accepting workers from that agency.

## **5. Due diligence**

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. Where possible, we build long standing relationships with our suppliers and make clear our expectations of business behaviour. We have in place systems to encourage the reporting of concerns and the protection of whistle blowers. We expect each supplier in the chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain.

## **6. Performance indicators**

We use the following key performance indicators (KPIs) to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Use of the Whistleblowing policy in relation to Modern Slavery and Human Trafficking**

Reviews of our recruitment and payroll systems to ensure recruitment practices remain legally compliant  
Reviews with our direct suppliers to understand the level of communication and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.



## **7. Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide initial training upon employment to relevant members of staff. All Directors have been briefed on the subject.

## **8. Director approval**

This statement has been approved by the company's board of directors, who will review and update it annually.

**Director's signature:**

**Director's name:**

Mark Lord  
Managing Director

**Date:**

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