

Slavery and Human Trafficking Statement

Statement under the UK Modern Slavery Act 2015 for the financial year 2018

This statement is made pursuant to Section 54 of The Modern Slavery Act 2015 and sets out our approach to ensuring that slavery and human trafficking is not taking place in our supply chains or in any other part of our business.

This statement relates to our financial year 2018 with our financial year ending 31 December 2018, and is our second annual statement.

About the AOT Energy Group and Scope of the Statement

The AOT Energy Group is headquartered in Zug, Switzerland in the form of the Group holding company AOT Holding Ltd. The Group has offices in all major trading locations and conducts business globally.

This Statement represents the Group policy and as such is applicable to all Group companies which are 100% owned by AOT Holding Ltd. We have identified three Group companies who may be subject to the UK Modern Slavery Act 2015; AOT Energy UK Ltd registered in England and Wales with company number 01910692, AOT Energy Switzerland AG registered in Switzerland with company number CHE-102.285.624 and AOT Trading AG registered in Switzerland with company number CHE-102.020.439.

Statement

All Group companies must comply with all applicable laws and regulations of the countries in which the Group operates as well as with all AOT Energy principles, policies and guidelines.

We have a zero tolerance policy to any form of human trafficking and slavery. Any allegations of such practices which are against our values and ethics will be investigated and if confirmed we will require third parties to take corrective action or we will terminate contracts with offending customers or suppliers.

Since our principle activity is trading we have limited direct contact with the original producer or ultimate end user of the commodities we trade. However, as part of our commitment to identify and mitigate risk, we will assess potential risk areas in our supply chain, particularly for any of our activities which are in areas considered a high risk for human trafficking and slavery. Such assessments are made at the time of counterparty onboarding and pre-deal activity review. During 2018 the business activities of the Group did not give rise to a high risk assessment requiring further review.

In November 2018 the Swiss government issued 'Guidance for the implementation of the UN Guiding Principles on Business and Human Rights in Commodity Trading'. This guidance has been long awaited in the commodity trading sphere and will play a key role in the development of future policies and standards.

We are now conducting a review process to further develop our policies in the area of Corporate Social Responsibility using the Swiss publication, and trade associations' commentary, as a guide. Senior group legal and compliance persons have attended workshops on the UN Guiding Principles and the Swiss guidance. Once the Group policies are updated we will ensure that employees receive



adequate, and refreshed, training to increase awareness of the matter together with their role in ensuring that risks can be identified and assessed.

This Statement, which will be reviewed annually and updated as required, has been approved by key stakeholders and senior management, and has been approved by the board of AOT Holding Ltd, who have authority to approve the statement on behalf of all Group companies, including AOT Energy UK Ltd, AOT Energy Switzerland AG and AOT Trading AG.

David Stanton
CFO AOT Holding Ltd
27th June 2019