

POLICY STATEMENT ON MODERN SLAVERY

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 which requires businesses to disclose publicly the steps they are taking to tackle slavery, servitude, forced labour and human trafficking – together known as Modern Slavery.

It sets out the steps taken by DL Hudson to ensure that slavery and human trafficking is not taking any place in its supply chains or in any part of its business.

At DL Hudson we respect human rights and do not tolerate any form of modern slavery or bullying. We recognise that every supply chain is at risk of modern slavery, and it is our responsibility to ensure we understand these risks and work in partnership with our suppliers to mitigate them.

OUR BUSINESS

We are a growing business headquartered in London, England.

Our trading expertise encompasses the principal and intermediary trading of commodities, investments, forex, and metals, and transacting across all compliant markets. The Group has active commodity related operations across Europe and is expanding into activities in South America and Africa.

Our strategy is to create sustainable growth over the bottom-line, adding value to our clients whilst maintaining entrenched relations with our suppliers, where we pay attention to the risk of Modern Slavery and ultimately to positively impact the final benefactor of the products we trade.

OUR APPROACH

DL Hudson has a specific policy in relation to supply chain and recruitment process to prevent slavery and human trafficking. And to ensure that any risks are mitigated against.

All DL Hudson staff go through the background checks.

This ensures we are aware of any criminal convictions relating to potential staff, as well as checking references, credit, and home addresses for at least the past two years. This process gives DL Hudson confidence that our staff are not involved in any activity relating to modern slavery, human trafficking and are legally able to work for DL Hudson.

We encourage our staff and suppliers to report any concerns about modern slavery and any other human rights violations.

There have been no reports of any modern slavery issues at DL Hudson, up to the period covered by this statement.

Our premises are classified as secure facilities. Once we have an office, we shall also audit staff movements via CCTV, which allows us to monitor for evidence of modern slavery, or other inappropriate behaviour.

SUPPLY CHAIN STANDARDS

The DL Hudson new Code of Conduct was introduced for all suppliers in June 2021 and this to ensure now been extended to existing suppliers.

This prohibits all forms of slavery, servitude, forced and compulsory labour and human trafficking. In addition, we ensure suppliers treat employees with respect and dignity and prevent discrimination, while adhering to the relevant employment legislation.

The Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking are not taking place anywhere in our business.

We expect our suppliers to meet the Minimum Standard for Labour Providers to tackle Modern slavery, which include:

- Ensuring employees are engaged under fair terms with reasonable pay and all staff have written contract of employment, with all wages paid directly to the individual worker.
- Prohibit any type of harassment including physical or verbal abuse, threats and bullying.
- Ensure working hours of employees comply with national laws and industry specific regulations. A standard working week should not exceed 48 hours, or with overtime, 60 hours.
- Ensure no person is employed who is below the minimum legal age for employment and ensure no person under 18 years of age is employed for any hazardous work.
- Prohibit forced, bonded or compulsory labour so that employees are free to leave their employment after reasonable notice. This includes no worker requirement to lodge deposits or identity papers, or no person has had to pay any direct or indirect fees to obtain work
- Allow all employees freedom to join, or not to join, an employee representative body.
- Ensure compliance with national legal and regulatory requirements and have a modern slavery policy with a clear escalation process.
- To inform DL Hudson of all sub- contracting or labour sourcing agents, for which these minimum standards must apply.

We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

TRAINING

The Directors have been fully briefed on the risks of modern slavery and DL Hudson continues to conduct internal training on the company's approach to compliance with the Modern Slavery Act. Managers within DL Hudson are trained about slavery and human trafficking and ensure all direct reports are updated.

This training is also being delivered to the procurement team, senior management and general managers and relationships.

Our internal policy document informs all employees about the Modern Slavery Act, the warning signs to look out for and how to raise any concerns either internally or by using **Modern Slavery Helpline 0800 0121700** <https://www.modernslaveryhelpline.org/>.

FUTURE PRIORITIES

We will continue to train our staff and keep refreshing the training to raise the awareness of any risk of Modern Slavery. Our plan is also to increase and improve due diligence to ensure our suppliers are meeting and can evidence compliance with these minimum standards.



Sanjeev Shah Tolia – Director
1 October 2022