

BARTON PETROLEUM (HOLDINGS) LTD



Slavery and Human Trafficking Statement

Slavery and Human Trafficking Statement – BPL-v3

Year ending 31st March 2019

Updated 05/05/19

Classification: Public

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INTRODUCTION FROM RICHARD BURTON (MANAGING DIRECTOR)

BARTON PETROLEUM (HOLDINGS) LTD are committed to improving our practices to combat slavery and human trafficking. Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships. To ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains we are enforcing effective systems and controls.

BARTON PETROLEUM (HOLDINGS) LTD are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all our contractors, suppliers, and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Whether adults or children, we expect that our suppliers will hold their own suppliers to the same high standards.

The Directors are responsible for compliance in their respective departments and for their supplier relationships.

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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 training to relevant members of staff. All Directors of BARTON PETROLEUM (HOLDINGS) LTD have received training on the subject and are aware of their legal responsibilities.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

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

1. Audits by our Quality Manager on compliance of our suppliers with our supplier requirements;
2. Use of labour monitoring and payroll systems;
3. Communication and personal contact with the next link in the supply chain and their understanding of, and compliance with our expectations.

WEBSITES

Our statement has been published on all our websites: - www.bartonpetroleum.co.uk & www.mkoil.co.uk & www.cotswoldpetroleum.co.uk & www.fwabbott.co.uk

RISK ASSESSMENT

We have carried out a risk assessment on our organisation & supply chain to assess what level of risk there may be in relation to our activities.

DEMONSTRATION OF PROGRESS

Our target is to ensure that we have a zero tolerance towards Slavery & Human Trafficking as defined by The Modern Slavery Act 2015. We have sent questionnaires to our main suppliers to confirm that they comply to the requirements and will keep these updated on a six-monthly basis.

FURTHER REVIEW

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2019. The Board will annually review the statement.

Approved by the board of directors Barton Petroleum (Holdings)Ltd as our Slavery and Human Trafficking Statement for the year ended 31 March 2019

A handwritten signature in black ink, appearing to read 'Richard Burton', with a stylized flourish at the end.

Richard Burton

Managing Director

Barton Petroleum (HOLDINGS) Ltd

5th May 2019