



## **Slavery and Human Trafficking Statement**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and explains the steps that Castleton Commodities International LLC (together with its subsidiaries, “we,” “us” and “CCI”) has taken during the financial year ending 31 March 2024 to prevent slavery and human trafficking from taking place in its supply chains or in other areas of its business.

CCI is committed to the maintenance of the highest ethical and legal standards. We seek to comply with both the letter and the spirit of all applicable laws and regulations, to deal fairly and honestly with our counterparties, and to avoid even the appearance of impropriety.

CCI has adopted a Compliance Manual that contains a requirement for all employees to comply with the laws of all countries in which we do business, and disciplinary or legal action may be taken by us against an employee for any violation of that requirement.

CCI has adopted a Code of Ethical Business Conduct, pursuant to which we strive to do business with suppliers, customers and counterparties who honour our principles and values, and to ensure that our customers and counterparties observe applicable health, safety and environmental standards as well as all applicable laws. We also apply screening procedures to our trading counterparties, ship owners, vendors, brokers and agents using a risk-based approach.

We encourage employees to contact the Company’s Compliance, Legal or Human Resources Departments, its dedicated toll-free anonymous hotline, or other Company resources open to them, if they have any questions or concerns about the Code of Conduct or the legality or ethics of a particular course of action or activity, or if they are unclear about the application of the law or the Code of Conduct to their responsibilities or activities.

We require employees to report immediately if they become aware of or are concerned about an actual or potential violation of the Code of Conduct or applicable law, regulation or policy (whether the violation involves them or someone else, including any employee, customer, counterparty, supplier, contractor, business partner or agent of the Company). This includes situations where potential non-compliance has been reported previously but the employee believes it has not been adequately addressed.

All employees have access to practical guidance regarding our policies and procedures.