



## **Modern Slavery Act Statement for 2017**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015.

It sets out the steps that Calor has undertaken, and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Calor has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We are committed to creating effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain. This is outlined in our Ethical Trading Policy, which is publicly available on our website.

### **Our organisation**

Calor supplies LPG and LNG to commercial and domestic customers throughout Great Britain. LPG can be supplied either via a portable cylinder or by a bulk tank, stored on the customer's property. LNG is distributed by tanker for use either as a transport fuel or for industrial customers. Calor is wholly owned by the Dutch company SHV and does not operate outside of the UK. The LPG and LNG sold by Calor is supplied either by SHV or from refineries in Great Britain.

### **Our salient human rights issues**

Calor has undertaken a desk-based review of its Tier 1 suppliers (those most significant, in terms of spend, in our supply chain) assessing the potential for incidences of modern slavery by using the Global Slavery Index. On this basis, Calor considers the highest risk areas are our suppliers, some of which operate internationally in countries of concern with regards to human rights.

In order to ensure that these suppliers operate in accordance with our expectations and the requirements of the Modern Slavery Act, we will:

- Review and revise our supplier audit to ensure that it contains human rights, ethics and sustainability.
- Regularly audit the operations of our major suppliers identified as being at most risk (at least every 3 years). In 2017, this audit process will start when we visit all our cylinder valve suppliers, which are based in India, Thailand, Turkey and Portugal.

Additionally, chartered boats transporting LPG and LNG are another risk area. However, all of our charter agreements include terms of employment for the ship's staff and crew which are acceptable to the International Transport Worker's Federation.

### **Our policies**

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Ethical Trading policy.
2. Code of Conduct (which includes whistleblowing and equal opportunities).
3. Environmental Policy.

### **Our suppliers**

Over the course of 2017, Calor will also be introducing a supplier standard, which will require all new suppliers to meet certain requirements, including modern slavery and sustainability. For Calor's existing suppliers, we will be reissuing terms and conditions to include adherence to Calor's policies, the Modern Slavery Act and our sustainability expectations.

From 2017, all new standard contracts for all suppliers will include the same requirements as well as including a more detailed questionnaire at supplier sign up to ensure awareness.

### **Training**

Calor will also introduce training in relation to modern slavery issues for our procurement team and other relevant staff and contractors, so that they are aware of the issues surrounding modern slavery and what to do if they suspect that it is taking place within our supply chain.

### **Our performance indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by the use of targets, relating to areas such as:

- requiring staff to undertake MSA training by a certain date.
- developing a system for supply chain verification.
- the level of communication and personal contact with next link in the supply chain.
- the completion of audits.

### **Responsibility for this policy**

The Calor Management Team has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

All managers will have the day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

### **Approval for this statement**

This statement was approved by the Calor Management Team on:

  
7/06/2017.

Jonathan Wood  
Compliance Officer