

Statement under Section 54 Modern Slavery Act 2015 (UK)

Rhodium Europe

- Rhodium Europe Limited ["REL"] is a UK incorporated company set up to carry on cross-border, international trading of physical commodities in bulk between producers of these commodities in one part of the world and users of the commodities in countries and regions in another part, usually far away. As a pure trader of physical goods across vast distances, REL does not own assets for the production, processing or manufacture of the commodities, and as such does NOT employ staff involved in physical labour related to these activities.
- With a sales revenue exceeding GBP 36 million, REL is required under section 54 of the United Kingdom Modern Slavery Act 2015 ["the Act"] to publish a statement setting out the steps taken by REL to prevent slavery and human trafficking from taking place in this chain of purchase and sale of commodities. Such a statement will cover Rhodium International Trading (UK) Limited ["RITUK"], a subsidiary of REL set up in 2018 to carry on part of REL's commodities trading business. RITUK's activities follow that of REL in trading of physical commodities internationally. Together, both companies may be referred to as "Rhodium Europe".

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- *Human Activities involved in Bulk Trading.* The physical commodities bought and sold by Rhodium Europe are traded on a "bulk" basis, with each trade consisting of cargo measured in weight ranging from hundreds to thousands of metric tonnes. Due to the size of these cargoes, the movement of the cargoes are via seagoing vessels, and Rhodium Europe staff are not physically involved in the transport of these commodities. As such, Rhodium Europe staff perform office functions in the trading of these commodities – contract negotiation and confirmation, documentation, arrangement/ procurement of cargo transportation services, accounting and banking/ payment activities.
- *Employment in accordance with UK laws.* All staff employed by Rhodium Europe are engaged under legally binding contracts in accordance with the employment laws of the United Kingdom, and are free to negotiate the terms before accepting employment with Rhodium Europe, and equally free to resign from Rhodium Europe in line with the terms of the employment contracts.
- *Low Risks of Slavery and Human Trafficking.* Rhodium Europe carries out a risk assessment generally every year, and the risks of committing slavery or participating in human trafficking are assessed as extremely low in relation to Rhodium Europe's business activities. Where Rhodium Europe obtains the services of other companies, screening of these service providers is carried out as part of "know-your-customer" checks to engage only with reliable and reputable providers. Rhodium Europe's assessment is that there is a low likelihood of slavery or human trafficking being carried out by these service providers that Rhodium Europe engages with.
- *Statement of Actions by Rhodium Europe.* Based on the assessment outlined above, Rhodium Europe's current actions are appropriate given the circumstances, and no additional steps have been assessed as critically required to support the objects of the Act. Notwithstanding this, Rhodium Europe continues to regularly review the risks arising from its activities, including reviewing the risks created by the service providers engaged by Rhodium Europe.

Statement reviewed and approved by Board of Directors

- This Statement for the year ending 28 February 2019 has been reviewed and approved by the Board of Directors.

Name of Director: CHEAM HING LEE

Signature: _____

Date: 2/01/2019

