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## BRITISH PIPELINE AGENCY LIMITED - Modern Slavery Statement

### INTRODUCTION

This statement applies to British Pipeline Agency Limited (BPA) and the information included in this statement refers to the financial year end of 2018.

BPA was established in 1969 by two of the world's largest integrated energy companies to develop, engineer and operate refined product pipelines and storage systems in the UK.

BPA is a leader in the engineering and operation of onshore oil transportation and storage facilities. It provides engineering planning, design and project management of hydrocarbon transportation pipelines and bulk storage assets in the UK as well as offering related consultancy services worldwide. Based in the UK, BPA has a head office in Hertfordshire with operational sites around England.

### DEFINITIONS

BPA considers that modern slavery encompasses:-

- Human trafficking
- Forced work, through mental or physical threat
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- Being dehumanised, treated as commodity or being brought or sold as property
- Being physically constrained or to have restriction placed on freedom of movement

### OUR COMMITMENT

BPA acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. We understand that this requires an ongoing review of both its internal practices in relation to its labour force and additionally, its supply chains.

BPA does not enter into business with any other organisation in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to BPA in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. We strictly adhere to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK.

### SUPPLY CHAINS

In order to fulfil its activities, the main supply chains of BPA include those related to the supply of materials, goods and services principally related to the provision of operating and maintaining oil pipelines and storage system.

### DUE DILIGENCE

BPA carries out suitable due diligence processes to ensure slavery and/or human trafficking does not take place in its organisation or supply chains. BPA has not to its knowledge conducted any business with another organisation which has been found to have involved itself with modern slavery.

BPA has taken the following steps to ensure that modern slavery is not taking place:

- Reviewed its supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

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- Where possible we have built relationships with our suppliers and customers and made clear our expectations of business behaviour
- Communicated our expectations to our supply chains that we expect these entities to have suitable anti-slavery and human trafficking policies and processes
- Provided training to staff on modern slavery
- Briefed all Managers and Directors on modern slavery
- Put systems in place to encourage the reporting of any concerns
- Carry out inspections and audits to ensure that our standards are being implemented throughout the business and that local legislation and regulations are complied with
- Assess any instances of non-compliance on a case-by-case basis and will then tailor remedial action appropriately

#### POLICIES

To further define BPA's stance on modern slavery, we have a Business Conduct Policy which sets out that all employees are expected to maintain the highest standards of ethical conduct in carrying out the business of the Company.

In respect of fulfilling our mission to conduct a growing, profitable business across a wide range of pipeline transportation and storage activities in the UK and overseas, BPA conducts its affairs in accordance with a series of business principles which provide the framework of policies and standards within which the company carries out its duties and responsibilities.

Any allegations or concerns raised of practices contrary to the above, will be investigated and relevant action taken with regard to BPA's obligations.

This statement is made in pursuance of section 54(1) of the Modern Slavery Act 2015 and will be reviewed each financial year.

*P M Davis*

P M Davis,  
Director and General Manager, BPA  
**April 2019**