Trading Atelier Ltd.

Modern Slavery and Human Trafficking Statement

(For the financial year ended 31 December 2024)

1. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Trading Atelier Ltd (“the Company”) to prevent modern slavery and human trafficking in its business and supply chains.

Trading Atelier Ltd is committed to acting ethically, transparently, and with integrity in all its business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere in our operations or supply chains.

2. Our Business and Structure

Trading Atelier Ltd is an independent company engaged in vessel chartering for the global trade of bulk commodities.

The company operates from the United Kingdom, chartering vessels internationally and engaging with suppliers, agents, and customers worldwide.

- Our supply chains include:
- Vessel owners and operators
- Port agents and logistics providers
- Commodity producers and storage facilities
- Professional service providers (brokers, consultants, IT, etc.)

3. Our Policies on Modern Slavery and Human Rights

We maintain internal policies and procedures designed to prevent any form of modern slavery, forced labour, or human trafficking within our organisation or our suppliers.

Our key policies include:

- Code of Conduct – defines ethical expectations for all staff and partners.
- Supplier Code of Conduct – requires suppliers and service providers to comply with labour laws and international human rights standards.
- Whistleblowing Policy – provides a confidential process for reporting unethical or illegal conduct.
- Due Diligence and KYC Policy – screens counterparties for compliance, sanctions, and integrity risks.

4. Due Diligence in Our Supply Chains

We apply a risk-based approach to assessing suppliers and counterparties.

Our due diligence includes:

Trading Atelier Ltd.

- Verification of ownership, registration, and reputation.
- Screening against international sanctions and adverse media databases.
- Requiring contractual undertakings regarding compliance with the Modern Slavery Act 2015 and international labour conventions.
- Periodic review of higher-risk service providers (e.g., manning agents, shipping intermediaries, or suppliers in high-risk jurisdictions).

5. Risk Assessment and Management

Given the nature of our business (chartering and bulk trading), the risk of modern slavery primarily arises within:

- The maritime sector, particularly where vessels are operated by third parties.
- The extraction, processing, and transport of raw materials in developing countries.

We mitigate these risks by:

- Engaging only with reputable, audited shipowners and suppliers.
- Preferring flag states and ship managers with strong labour oversight.
- Maintaining close oversight of brokers and agents through KYC and contractual clauses.

6. Training and Awareness

We train key staff in:

- Recognising signs of forced or exploitative labour.
- Reporting procedures under our internal policies.
- Compliance with UK and international labour standards.

7. Effectiveness and Performance Indicators

To measure our progress, we monitor:

- The number of suppliers and counterparties screened for ethical compliance.
- The number of reported concerns and follow-up actions.
- Annual reviews of supplier questionnaires and contractual terms.

We will continue to improve our systems and processes to ensure compliance and transparency across our operations.

This statement is in respect of the company's financial year ended 31st December 2024 and was approved by the Trading Atelier Ltd. Director on 30th January 2025.

Updated 30th January 2025.