Trading Atelier Ltd.

Modern Slavery and Human Trafficking Statement

(For the financial year ended 31 December 2025)

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") during the financial year ended 31 December 2025 to prevent modern slavery and human trafficking in its business operations and supply chains.

Trading Atelier Ltd is committed to conducting business ethically, transparently and with integrity. We maintain systems and controls designed to minimise the risk of modern slavery, forced labour, servitude, human trafficking and other forms of labour exploitation within our operations and business relationships.

2. Our Business and Structure

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

The Company operates from the United Kingdom and conducts business globally through relationships with shipowners, charterers, logistics providers, agents and other commercial counterparties.

Our principal supply chains include:

- Vessel owners and ship management companies;
- Port agents, terminal operators and logistics providers;
- Commodity producers, suppliers and storage facilities;
- Professional service providers, including brokers, consultants, legal advisors and information technology providers.

3. Policies and Governance

We maintain policies and procedures intended to support ethical business conduct and compliance with applicable laws and internationally recognised human rights standards.

Key policies include:

- Code of Conduct, setting out expected standards of ethical behaviour for employees and business partners;
- Supplier Code of Conduct, requiring suppliers and service providers to comply with applicable labour laws and human rights principles;
- Whistleblowing Policy, providing a confidential mechanism for reporting concerns relating to unethical, unlawful or improper conduct;
- Know Your Customer ("KYC") and Due Diligence Procedures, designed to identify legal, compliance, sanctions and integrity risks associated with counterparties.

Trading Atelier Ltd.

Responsibility for oversight of modern slavery risks rests with the Company's management, supported by its compliance and risk management processes.

4. Due Diligence Processes

The Company applies a risk-based approach to the assessment of suppliers, counterparties and business partners.

During 2025, our due diligence procedures included:

- Verification of corporate ownership, registration and business credentials;
- Screening against applicable sanctions lists and adverse media databases;
- Risk-based assessment of counterparties operating in sectors or jurisdictions considered to present elevated labour rights risks;
- Inclusion, where appropriate, of contractual provisions requiring compliance with applicable anti-slavery, labour and human rights legislation;
- Periodic review of higher-risk suppliers and service providers.

Where concerns are identified, additional enquiries may be undertaken before entering into, renewing or continuing a business relationship.

5. Risk Assessment and Risk Management

As a business operating within international commodity trading and maritime transportation sectors, the principal areas of potential modern slavery risk include:

- Maritime operations involving vessels managed or crewed by third parties;
- Commodity extraction, processing and transportation activities in higher-risk jurisdictions;
- Supply chain participants operating in regions where labour protections may be less robust.

To mitigate these risks, the Company seeks to:

- Conduct business with reputable counterparties that demonstrate appropriate compliance standards;
- Engage, where practicable, with shipowners, operators and managers that maintain recognised labour and crew welfare standards;
- Incorporate compliance and integrity considerations into supplier and counterparty onboarding processes;
- Monitor developments relating to labour rights and modern slavery risks within relevant sectors and jurisdictions.

6. Training and Awareness

Relevant employees receive training and guidance appropriate to their responsibilities, including awareness of:

- The indicators of modern slavery, forced labour and human trafficking;
- Procedures for escalating concerns;
- The Company's compliance obligations and ethical standards;
- Relevant UK legislation and international labour principles.

The Company continues to promote a culture in which concerns can be raised without fear of retaliation.

7. Measuring Effectiveness

The Company monitors the effectiveness of its approach through a range of compliance and governance measures, including:

- Completion of due diligence and screening procedures for new counterparties;
- Review of supplier and counterparty compliance information where appropriate;
- Monitoring and investigation of any reported concerns;
- Periodic review of policies, procedures and contractual protections.

During the financial year ended 31 December 2025, the Company was not made aware of any instances of modern slavery or human trafficking within its own operations.

8. Future commitments

During 2026, the Company intends to continue strengthening its due diligence and risk assessment processes and to review its policies periodically to ensure they remain appropriate to the nature and scale of its business activities.

This statement has been approved by the Director of Trading Atelier Ltd and constitutes the Company's Modern Slavery and Human Trafficking Statement for the financial year ended 31 December 2025.

Approved on: 30 January 2026.

Pedro Acien

Director

Trading Atelier Ltd