Modern Slavery Statement for year ended 31st March 2019

Policy

Morgan Fuel & Lubes Ltd (Morgan Fuels) is opposed to slavery and human trafficking in all parts of its business activities and supply chain. The Company is therefore committed to ensuring that they have adequate policies and procedures in place to identify and prevent these practices.

Business

Morgan Fuels provides fuel card services, bulk fuels, lubricants and capital equipment to commercial, agricultural, retail and domestic customers a comprehensive site network across Ireland, Europe and the UK.

Structure

The Company has its head office in Newry, Northern Ireland with over 4,500 sites across 16 countries in Europe accepting their fuel card.

Supply Chains

The supply chains are relatively short and essentially relate to the distribution of fuel and the production of plastic cards and the acceptance of cards for the supply of goods.

Policies on Slavery and Human Trafficking

The Company is committed to ensuring that there is no modern slavery or human trafficking in their supply chains or in any part of their business. The company is also committed to acting ethically and with integrity in all of their business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in their supply chains.

As part of their initiative to identify and mitigate risk:

- The company requires all fuel stations, toll operators and every location their cards are accepted, across the UK and Europe to observe the highest ethical standards;
- Where possible the company builds long standing relationships with local suppliers, fuel stations, toll operators and other suppliers where their cards are accepted and makes clear their expectations of business behaviour;
- With regards to national or international supply chains, the point of contact
 is preferably with a UK company or branch and the company expects these
 entities to have suitable anti-slavery and human trafficking policies and
 processes. The company expects each entity in the supply chain to, at
 least, adopt 'one-up' due diligence on the next link in the chain;

- The company has in place systems to encourage the reporting of concerns and the protection of whistle blowers;
- The company has zero tolerance to slavery and human trafficking and expects all those in the supply chain and contractors to comply with their values.

Risk Assessments

The Health & Safety Advisor is responsible for risk assessments in respect of human rights and modern slavery.

Due diligence

The Operations Director is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in their supply chains and their business, the company provides training to relevant members of staff. All Directors have been briefed on the subject.

Measuring Effectiveness

The company uses the following key indicators to measure how effective they have been in ensuring that slavery and human trafficking is not taking place in any part of their business or supply chains:

- Ability to conduct audits on any Supplier;
- Use of labour monitoring and payroll systems
- Level of communication and personal contact with all parties involved and their understanding of, and compliance with, the company's expectations

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the current financial year.

Hugh Morgan Managing Director 18th April 2019