

Slavery and Human Trafficking Statement Year ended 31st March 2025

For the Financial Year Ending 31 March 2025 Issued by
LCC Group Limited and its UK Affiliates



Slavery and Human Trafficking Statement Year ended 31st March 2025

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015. It outlines the steps taken by LCC Group Limited and its UK-based trading affiliates (LCC) during the financial year ending 31 March 2025 to prevent modern slavery and human trafficking in our operations and supply chains.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our Business and Structure

LCC is a diversified energy and logistics company operating across the UK and beyond. Our business activities span fuel importation, distribution, and power generation. We are committed to conducting business ethically, responsibly, and in compliance with all applicable laws, including those relating to modern slavery and human rights.



Our Supply Chains and Risk Assessment

Our supply chains include a wide range of suppliers, customers, and partners across the energy, transport, engineering, and logistics sectors. We assess modern slavery risks based on:

- Country of operation
- Industry-specific risks
- The nature and duration of business relationships

This helps us identify higher-risk areas, which we monitor more closely. We conduct due diligence on all suppliers before agreeing to enter into a business contract.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under all applicable legislation in any jurisdiction. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we have prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Progress Since Last Year

As part of our ongoing efforts to enhance our approach to ethical business and supply chain transparency, we introduced a dedicated due diligence and monitoring programme during the 2023–2024 financial year. This system enables us to:

- Input and centralise key information about our suppliers, customers, and business partners
- Continuously monitor third parties for adverse media or ethical concerns
- Receive alerts through real-time screening tools, including Factiva, to help identify and respond to potential risks promptly

This represents a significant enhancement to our risk management processes compared to the previous year.



Policies and Governance

We have several policies in place that support our approach to identifying and addressing modern slavery risks, including:

- Anti-Slavery and Human Trafficking Policy – Outlining our expectations of staff and suppliers, and our procedures for managing risks
- Whistleblowing Policy – Enabling staff and third parties to raise concerns in confidence

Training and Awareness

We provide training to employees across relevant functions, especially procurement and compliance, to help them identify and act on signs of modern slavery. Staff are also made aware of how to use internal reporting mechanisms and how to engage with our due diligence processes.

Monitoring and Continuous Improvement

We are committed to regularly reviewing and improving our practices. Our recently implemented adverse media based monitoring system is a key part of this commitment, allowing for continuous screening of third-party entities and early detection of potential concerns. In the coming year, we aim to:

- Expand the scope of our automated risk monitoring system
- Enhance due diligence at the onboarding stage
- Increase awareness and engagement across broader team



Breaches

We may terminate our relationship with any individuals and organisations working for us or on our behalf if they breach our Anti-Slavery and Human Trafficking Policy.

Contact

For further information on any element of this policy please contact:

LCC Group Limited

Policy Control and Implementation

16 Churchtown Road

Cookstown

BT80 9XD

Signed


Daniel Loughran

