

## Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Affinity (Shipping) LLP and its subsidiaries ("Affinity") during year ended 31st December 2021 to prevent modern slavery and human trafficking in its business and value chains.

### Our Business

We provide integrated ship broking and advisory services to ship owners, charterers and energy companies in the maritime industry through our business divisions situated globally. We have a whole market approach that includes New Building, Sale & Purchase, Recycling, Commodities, Energy, Financial Services, Operations, Advisory and Research. The supply chain to our business is comprised primarily of professional services, IT, communications, travel and office services.

### Our Policies

Affinity recognises that slavery, servitude, forced labour and human trafficking ("Modern Slavery") continues today and poses a risk to all businesses including ours. Affinity's Code of Conduct is a set of principles and guidelines which support ethical behaviour and decision making in our business. All staff worldwide are expected to adhere to the Code of Conduct as well as any third parties who work on our behalf.

All members of staff are given the Affinity Whistle Blowing Policy that provides practical guidance on reporting a breach in our Code of Conduct and potentially illegal activity.

### Due Diligence Process

We have developed various onboarding processes and procedures for employees, contractors, customers and suppliers. We are in the process of developing a Supplier Charter which will request our suppliers to ensure that they and their own supply chains comply with legislation regarding Modern Slavery or any similar regulations in their jurisdiction.

### Risk Assessment

We consider our exposure to the risk of slavery/human trafficking to be minimal. However, we continue to take necessary steps both internally and with those we have dealings with externally to ensure such practices do not occur.

### Training

Training has been incorporated into our induction programme. As we have a new e-learning provider, all staff members are now assigned with the new version of our Code of Conduct training and we are in the process of adding targeted modern slavery training to our induction programme. Our training courses are reviewed annually.

### Actions Taken During 2021

We changed our e-learning service provider to one that offers a broader range of compliance training material and offers a superior level of customer service.

We changed our third-party screening tool provider to a well-known industry leader in governance, risk and compliance tools.

Updates and minor improvements were made to our customer onboarding questionnaires.



Richard Fulford-Smith  
Chief Executive

This statement has been reviewed and approved by the LLP members on 13 June 2022

#### **Affinity (Shipping) LLP**

44<sup>th</sup> Floor, The Leadenhall Building  
122 Leadenhall Street, London, EC3V 4AB

T. +44 203 142 0100  
F. +44 203 142 0101

E. [info@affinityship.com](mailto:info@affinityship.com)  
W. [affinityship.com](http://affinityship.com)

Reg No: OC395209