



Modern Slavery and Human Trafficking Statement

This statement applies to all Nuevo Partners entities and their subsidiaries:

- **Nuevo Partners LLP**
- **Nuevo Partners UK LLP**

All entities are grouped together as **Nuevo Partners** in this statement. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015.

Introduction

Nuevo Partners supports the fundamental principles of human rights and takes our obligations under the Modern Slavery Act 2015 seriously. Additionally, we are committed to upholding human rights and combatting all forms of slavery, forced labor, human trafficking, and exploitation in our operations and supply chains, as well as operating in accordance with the International Bill of Human Rights. We recognize our responsibility to ensure ethical practices and compliance with all applicable laws, including the UK Modern Slavery Act 2015, US Tariff Act of 1930, 18 U.S.C. Chapter 77, Texas Penal Code § 20A.02, and other relevant regulations.

Our Company

Nuevo Partners is an arranging broker that specializes in brokering physical and financial energy related commodities. Our company only deals with institutional customers and has clients in Europe, Asia and the Americas including international banks, oil major, trading houses and hedge funds.

We have offices in Houston and London and employ circa 30 employees. As a global company, we rely on nearly one hundred suppliers, the majority of which are leading providers of telecoms, IT, market data, exchange/regulatory services, and professional services located in the US and UK.

Risks of Human Trafficking and Modern Slavery

Nuevo Partners understands that all industries and geographic regions may be affected, to varying degrees, by the risk of human trafficking and modern slavery.

Overall, given the nature of our specific business operations and supply chain, Nuevo Partners considers the risk of modern slavery and human trafficking is low.

Nuevo Partners

Modern Slavery and Human Trafficking Statement

Nuevo Partners has assessed that the risks of modern slavery and human trafficking are low in our daily business operations. The risks are further lowered by the fact that Nuevo Partners operates in highly regulated markets and jurisdictions. The regulated commodities brokerage sector is not generally regarded as a high-risk sector. Our employees, most of whom are highly skilled industry professionals, are not materially at risk of human trafficking or modern slavery. Notwithstanding this, Nuevo Partners has a rigorous employee onboarding procedure, including identity and right to work checks, that enables us to ensure that all employees are eligible to work and above the minimum working age, according to local laws.

Nuevo Partners recognizes that our most likely exposure to modern slavery lies within our supply chains. However, since our supply chains are mainly focused on indirect business-to-business procurement categories (i.e. regulatory consulting, market data, legal services, etc.), there is a lower risk of human trafficking and modern slavery when compared to materials manufacturing or consumer products for resale.

Nuevo Partners measures taken against the risk of Human Trafficking and Modern Slavery

As a broker operating in highly regulated markets with institutional customers, we are considered at relatively low risk for modern slavery. Similar to other financial and professional services, our employee base is comprised of experienced hires carrying out specialized roles. Despite this low risk, Nuevo Partners is committed to implementing systems and controls aimed at ensuring that human trafficking and modern slavery is not taking place within our business or supply chains.

Nuevo Partners has thorough employee onboarding checks and procedures to ensure all employees are of lawful age and have the right to work in the jurisdiction within which they are employed. Checking for potential regulatory actions against prospective employees further ensures that Nuevo Partners personnel are in line with the company's high ethical standards.

Nuevo Partners believes its suppliers should operate with high standards of business conduct and ethical integrity. We conduct due diligence in accordance with our Third-Party Service Provider Policy on prospective suppliers.

Responsibilities and Accountabilities

Nuevo Partners recognizes that it is responsible for promoting ethical business practices and procedures that protect workers from being abused or exploited.

Nuevo Partners**Modern Slavery and Human Trafficking Statement**

The prevention, detection, and reporting of human trafficking and modern slavery in any part of the company or its supply chains is the responsibility of all Nuevo Partners employees and contractors working on our behalf. All employees must not engage in, facilitate or fail to report any activity that might lead to or imply a breach of this policy.

Nuevo personnel should report suspected human trafficking and modern slavery to:

- [Modern Slavery Helpline \(UK\): +44 \(0\) 8000 121 700](#)
- [National Human Trafficking Hotline \(US\): 1-888-373-7888](#)
- [iWatchTexas Hotline \(US-TX\): 1-844-643-2251](#)

This policy applies to all persons working for or on behalf of Nuevo Partners, in any capacity, at all levels, including partners, principals, directors, managers, employees, temp workers, and contractors.

If any employee or contractor of Nuevo Partners is discovered to have breached this policy, then appropriate action will be taken. This may include, but is not limited to, termination of employment or contracts, legal action or regulatory action.

Policy Review

As with all Nuevo Partners policies, this policy is reviewed on an annual basis to ensure compliance with relevant laws and regulations.

Thomas D. Polec

Thomas Polec

Managing Partner