

MODERN SLAVERY POLICY

Ceres and Barrow are committed to ensuring that its staff and any agency workers it employs are not subject to behaviour or threats that may amount to modern slavery, human trafficking, forced labour, and or similar human rights abuses.

We are also committed to ensuring our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain.

This policy sets out Ceres and Barrow's actions to understand all potential modern slavery risks related to the business and to ensure steps are maintained to prevent both slavery and human trafficking.

Our Business

Ceres and Barrow are fully licensed UK gas shippers and suppliers, with extensive experience in the gas market. We offer gas trading and operational management tailored to gas producers at any scale linking upstream supply to downstream end users.

As a service provider based in the UK, Ceres and Barrow do not operate in an industry with a high risk of modern slavery and this policy is appropriate to that level of risk.

Policy

We are committed to acting ethically and with integrity in all our business relationships and ensuring that there is no modern slavery, human trafficking illegal child labour or forced labour in our supply chains or in any part of our business.

Our Practices

We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

Employees responsible for managing suppliers and others involved with Ceres and Barrow are responsible for ensuring that our values and ideals are upheld.

Recruitment and Selection

Barrow and Ceres use only specified, reputable employment agencies to source labour. We check that the employees have the right to work and are therefore protected by employment legislation. This includes checking right-to-work documents, visas and passports.

We do not employ individuals that would be considered to be 'child workers'. Young and inexperienced workers may be employed or given work experience, but they are subject to the rights and protections that we afford all workers.

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Jan 23	V1	Modern Slavery policy	R Butters	Director	Jan 24
Sep 25	V2	Modern Slavery policy	R Butters	Director	Sep 25

Employment Rights

Basic rights which we expect all workers to enjoy, include:

- The right to a reasonable wage
- The right to a safe working environment
- The right to an appropriate level of holiday and cover for period of sickness
- The freedom to complain directly via our whistleblowing policy free of charge, if they believe that they are not being fairly treated or have any other concerns.

Our Suppliers

We have zero tolerance to slavery and human trafficking and will only deal with suppliers who share our values.

Training

We direct employees towards resources that all them to better understand modern slavery and the signs, and encourage discussions on the topic.

Signed by: Rosanna Butters

Position: Director (Ceres)

Signature: 

Signed by: Graeme Hunter

Position: Director (Barrow)

Signature: 

Date: September 2025

Review date: September 2026

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