

**ExxonMobil Investment Company Limited**

Ermyn House  
Ermyn Way  
Leatherhead  
Surrey KT22 8UX  
+44 (0) 1372 222000 Telephone  
+44 (0) 1372 222622 Facsimile



**SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR 2020.**

The Modern Slavery Act 2015 contemplates that certain commercial organizations will prepare an annual slavery and human trafficking statement and either publish it on their website if they have one or provide it to the public on request.

The slavery and human trafficking statement either: (i) describes the steps the organization has taken during the financial year to confirm that slavery and human trafficking are not taking place in its supply chains or its own business; or (ii) confirms that the organization has taken no such steps.

This slavery and human trafficking statement is provided for the financial year ending 31 December 2020 by ExxonMobil Investment Company Limited (the Company) and was approved by the Company's board by resolution on 25th July 2021.

**THE COMPANY'S STRUCTURE, BUSINESS AND SUPPLY CHAINS**

The Company and/or its affiliates in the United Kingdom are involved in offshore oil and gas, gas and power marketing activities, pipeline and distribution operations, refining and marketing of fuels and lubricants and the manufacture of plastics and petrochemicals.

The Company's supply chain includes suppliers providing goods and services to multiple ExxonMobil affiliates and are contracted by the Procurement function. This consists of engineering, procurement and construction services, general facilities maintenance and technical support services, transportation services, operations maintenance and support services, catering services, corporate services such as information technology and marketing support, temporary labour and goods and equipment. The processes applied by the Procurement function (some of which are noted in this statement) operate for the benefit of ExxonMobil affiliates, including the Company.

**POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

Understanding and addressing the interests of communities where we operate is critical to the Company in maintaining a sustainable business. We believe the quality of the relationships we develop with local communities has a direct impact on the long-

term success of our activities, and that our business presence should have a positive influence on the people in the communities where we operate.

The Company is committed to respecting human rights as a fundamental principle in our operations, reinforced through training and integrated into our policies and practices.

Our practices reflect the spirit and intent of the United Nations' **Universal Declaration of Human Rights** and are guided by elements of the United Nations' **Guiding Principles on Business and Human Rights**.

The Company's **Standards of Business Conduct** are the principles that guide the conduct of the Company's business operations. Through the Standards of Business Conduct the Company commits to:

- being a good corporate citizen in all the places the Company operates;
- maintaining high ethical standards;
- obeying all applicable laws, rules and regulations; and
- respecting local and national cultures.

The Standards of Business Conduct include the Company's **Ethics Policy**, which affirms the Company's philosophy that the way results are achieved is as important as the results themselves, and states that even where the law is permissive, the course of highest integrity is chosen.

The Company's commitment to respecting human rights is supported by the Standards of Business Conduct and **Statement on Labor and the Workplace**, which reinforces the Company's support for the principles of the International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work ("ILO Declaration"), notably the abolition of child labour, elimination of forced labour and workplace discrimination and harassment, and recognition of freedom of association.

More specific to modern slavery and human trafficking, consistent with our Standards of Business Conduct and our Ethics Policy, we expect compliance by all officers and employees with applicable laws and regulations in respect of working conditions and the payment of wages and benefits. This would include a prohibition of slavery and human trafficking.

The Company does not utilize forced or compulsory labour. All employees of the Company are recruited and provided with working conditions that comply with applicable laws and regulations.

The Company forbids the use of children in its workforce. Company employees are above the legal employment age in the country of their employment.

**DUE DILIGENCE PROCESSES AND ASSESSMENT AND MANAGEMENT OF SLAVERY AND HUMAN TRAFFICKING RISKS IN THE COMPANY'S BUSINESS AND SUPPLY CHAINS**

The Company operates its business through various standards, procedures and processes, which outline model practices in various socioeconomic areas, including human rights. The **Operations Integrity Management System** under which the Company operates its business plays a role in managing ongoing risks in the area of human rights. It provides a standard and integrated approach to identifying, monitoring and managing risks in our operations, including potential human rights risks.

With regard to the Company's supply chain, we seek to work with suppliers who share our commitment to respecting human rights.

Procurement professionals apply a rigorous set of standards and follow procedures that outline the requirements for acquiring goods and services, processes for qualifying suppliers, executing contracts and monitoring supplier performance during the contract term. Prior to awarding a contract to a new supplier, the Procurement function's due diligence process is designed to screen suppliers across a number of compliance areas (e.g. sanctions, anti-corruption, and human trafficking violations) using government and media databases.

Standard requests for quotations used by the Procurement function highlight the Company's expectation that the supplier shall:

- comply with all applicable laws prohibiting the utilization of forced or compulsory labour.
- provide its employees with working conditions, including payment of wages and benefits, which comply with all applicable laws.

- ensure that its employees meet the legal employment age requirements in the country of employment.

The standard terms and conditions used by the Procurement function oblige suppliers to:

- adhere to all applicable laws and regulations, including those related to employment, safety, security, health and the environment;
- impose similar terms and conditions on their subcontractors; and
- permit audits and allow access to office / work locations, documentation and personnel.

These standard terms also allow for termination if the supplier's performance is not acceptable.

In 2016, the Company published its **ExxonMobil Supplier, Vendor and Contractor Expectations**, a set of guidelines that outlines expectations of suppliers, vendors and contractors, inclusive of human rights. In particular this reinforces the expectation that suppliers, vendors and contractors:

- conduct operations and business practices in a manner consistent with the ILO Declaration noted above; and
- manage activities in a manner that respects human rights and is consistent with the spirit and intent of the United Nations Guiding Principles on Business and Human Rights in effect as of 2011.

The Company clearly reiterates its expectations of suppliers, including on human rights, on an annual basis through a **Year End Supplier Letter**. This letter highlights that suppliers are expected to conduct business in compliance with standards similar to the Standards of Business Conduct and that compliance with all applicable laws is a fundamental expectation.

**EFFECTIVENESS IN ENSURING THAT SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN ITS BUSINESS OR SUPPLY CHAINS**

To establish a consistent understanding of our ethical standards, employees are required to confirm annually that they have read and are in compliance with the Standards of Business Conduct.

Through the Company's procedures and "Open Door Communication" process, employees are encouraged to ask questions, voice concerns, and make appropriate suggestions regarding the business practices of the Company.

Employees are expected to report promptly to management suspected violations of law, the Company's policies, and the Company's internal controls, so that management can take appropriate corrective action.

Depending on the subject matter of the question, concern, or suggestion, each employee has access to alternative channels of communication, for example, the Controller's Department; Internal Audit; the Human Resources Department; the Law Department; the Safety, Health and Environment Department; the Security Department; and the Treasurer's Department.

Employees have access to processes that allow for questions, concerns and suggestions to be made without identifying themselves. Several confidential mechanisms for reporting are provided, including a 24-hour phone number and a mailing address.

### **TRAINING ABOUT SLAVERY AND HUMAN TRAFFICKING AVAILABLE TO STAFF**

The Company also reflects its commitment to respecting human rights as a fundamental principle in our operations, reinforced through training. Throughout 2020, computer based human rights awareness training was available to Company employees, including professionals in the Procurement function, to improve their understanding of human rights issues and awareness of potential human rights risks.


### **OTHER INITIATIVES**

ExxonMobil continues to work closely with IPIECA (the global oil and gas industry association for advancing environmental and social performance) to monitor business and human rights trends, and to share practices and develop guidance in human rights due diligence and supply chain management with the oil and gas industry and other extractive industries. In 2020, IPIECA published the *Sustainability Reporting Guidance for the Oil and Gas Industry* that was jointly developed amongst IPIECA, the American Petroleum Institute (API) and the International Association of Oil & Gas producers (IOGP). ExxonMobil was actively engaged in the development of the expanded social

performance section of this guidance, which embeds human rights considerations throughout the sustainability reporting guidance.

More information on ExxonMobil's corporate citizenship approach and activities is available in the annual Corporate Citizenship Report or at [www.exxonmobil.com](http://www.exxonmobil.com)

## **Signed for and on behalf of ExxonMobil Investment Company Limited**

DocuSigned by:  
  
BFD42E0E38354F3...

---

### **Director**

**Name: Andrew Johnson**

**Date:** August 16, 2021

Nothing in this material is intended to override the corporate separateness of local entities. Working relationships discussed in this material do not necessarily represent a reporting connection, but may reflect a functional guidance, stewardship, or service relationship. Where shareholder consideration of a local entity matter is contemplated by this material, responsibility for action remains with the local entity.

Exxon Mobil Corporation has numerous affiliates, many with names that include "ExxonMobil." For convenience and simplicity in this Statement, "ExxonMobil" and terms like "Company," "our," "we" and "its" are sometimes used as abbreviated references to specific affiliates or affiliate groups. Abbreviated references describing global or regional operational organizations and global or regional business lines are also sometimes used for convenience and simplicity.

Registered in England  
Number: 5298041  
Registered Office:  
Erbyn House, Erbyn Way  
Leatherhead, Surrey KT22 8UX