

## **SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR FINANCIAL YEAR 2022.**

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 organisation 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 organisation has taken no such steps.

This slavery and human trafficking statement is provided for the financial year ending 31 December 2022 by ExxonMobil Gas Marketing Europe Limited (the Company) and was approved by the Company's board by resolution on 26<sup>th</sup> June 2023.

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

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

The Company's supply chain includes suppliers providing goods and services to multiple ExxonMobil group companies 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 group companies, including the Company.

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

The Company condemns human rights violations in any form. We do not utilise forced or compulsory labor in our operations, including prison labor. 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.

The Company is steadfast in its commitment to respecting human rights as a fundamental principle in its operations. Its approach is guided by the goals of universally recognised principles, which are integrated into its policies and practices and regularly reinforced through training.

The Company's commitment to respecting the rights of our workforce and those within the communities where it operates is embedded throughout its policies, practices and expectations and reflect the spirit and intent of the United Nations' **Universal Declaration of Human Rights**. They also support the **International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work** including:

- Freedom of association and effective recognition of the right to collective bargaining.
- Elimination of all forms of forced and compulsory labour.
- Effective abolition of child labour.
- Elimination of discrimination in respect of employment and occupation.

The Company's policies and practices also incorporate elements of the **2011 U.N. Guiding Principles on Business and Human Rights** "Protect, Respect and Remedy" framework for the distinct but complementary roles of businesses and governments regarding human rights including commitments, due diligence and access to remedy.

The Company addresses human rights through the collective of its policies and practices. The following key standards, procedures and processes guide the Company's integrated approach to human rights.

The Company's **Standards of Business Conduct** include our "foundation policies" and define our goals for the Company's ethical conduct. The Board of Directors adopts and administers these standards, which uphold the values of human rights, labor, the environment and anti-corruption.

Core policies from our Standards of Business Conduct include:

- Ethics: We comply with applicable governmental laws, rules and regulations. Our ethics policy 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.
- Health: We identify, evaluate and manage health risks related to our operations that potentially affect employees, contractors or the public.

- Complaint procedures and open door communication: These encourage employees to ask questions, voice concerns, and make appropriate suggestions regarding the business practices of the Company.
- Environment: We conduct our business in a manner compatible with the balanced environmental and economic needs of the communities in which we operate.
- Safety: We conduct our business in a manner that protects the safety of employees, others involved in operations, customers, and the public.
- Equal Employment Opportunity: We provide equal employment opportunity in conformance with all applicable laws and regulations to individuals who are qualified to perform job requirements.

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 Company's commitment to human rights is supported by our **Statement on Labor and the Workplace**, which articulates the Company's support for the principles of the International Labour Organization 1998 Declaration on Fundamental Principles and Rights at Work ("ILO Declaration"). The Company supports these principles, developing and implementing policies, procedures and practices that align with applicable laws and specific circumstances to accomplish the objectives of the ILO Declaration..

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.

## **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. We hold our suppliers, vendors and contractors to stringent compliance, anti-corruption, non-conflict, safety and other guidelines and our standard terms and conditions oblige suppliers to adhere to all applicable laws and regulations.

Procurement professionals apply a rigorous a 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, Procurement'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 third-party information such as government and media databases. Our due diligence process for identifying, assessing and monitoring human rights risks focuses on three factors: supplier, commodity, and location. Identification of a higher risk in these areas triggers our further assessment of a supplier's policies and risk management practices prior to continuing with the contracting process.

Additional due diligence is applied when procuring goods and services that utilise a significant amount of low-skilled, physical labour in a country ranked in the lower tiers (i.e., 2 Watch, 3 or Special Case) of the Trafficking in Persons (TIP) Report published by the U.S. Department of State. If a potential higher risk is identified, then the potential suppliers complete a questionnaire prior to contract award to assess whether they have the policies or practices in place to address such risks and we review and assess the responses prior to continuing with the contracting process.

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. Enhanced contractual requirements with respect to human rights and modern slavery may also be utilised depending on the level of risk assessed.

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 including the elimination of child labour, forced labour, workplace discrimination, and recognition of freedom of association; 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.

A select number of suppliers are audited each year for contract compliance, such as related to pricing, safety, drug and alcohol policy compliance, invoicing and travel expenses. A supplier's contract may be subject to termination if the supplier is not meeting the Company's expectations.

## **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. We provide several confidential mechanisms for reporting, 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 2022, computer based human rights awareness training was available to Company employees, including professionals in the Procurement function, to build understanding of human rights issues and an awareness of potential human rights risks.

## **OTHER INITIATIVES**

ExxonMobil continues to work closely with Ipieca to monitor business and human rights trends, including to develop and share practices on human rights due diligence and human rights supply chain management with the oil and gas industry and other extractive industries.

More information on ExxonMobil's efforts regarding environmental, social and governance performance is available in the annual Sustainability Report (formerly the Corporate Citizenship Report) or at [www.exxonmobil.com](http://www.exxonmobil.com)

## **Signed for and on behalf of ExxonMobil Gas Marketing Europe Limited**

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**Director**

**Name:** JUSTIN JACKSON

**Date:** June 30, 2023

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