



Statement under the UK Modern Slavery Act for financial year ending 31 December 2022

This statement is published by Pevale Energy LLC and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

Introduction

Pevale is opposed to all forms of modern slavery. Such exploitation is against Pevale's commitment to respect human rights as set out in the Universal Declaration of Human Rights and the International Labour Organization's 1998 Declaration on the Fundamental Principles of Rights at Work. This is Pevale's second published UK Modern Slavery Act statement setting out the steps we have taken against modern slavery in our business and supply chains.

Our business and supply chains

Our operations are divided into our product businesses: crude oil, gas including LPG and LNG, and petroleum products. Each of these products have supply chains that provide labour, goods, and services. We purchase these products from a dozen producers globally and sell to clients in more 30 countries

Our business development team aims to develop and strengthen relationships with contractors and suppliers who are committed to the Pevale's principles or to equivalent standards through their own activities and the management of their own suppliers and subcontractors. Each of Pevale's contractors and suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.

Our values and policies

We recognise our responsibility to respect human rights in all aspects of doing business and have embedded human rights in the Pevale Code of Conduct, and the Pevale Criminal Compliance Manual.

Our approach is informed by the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the 1998 Declaration on the Fundamental Principles of Rights at Work of the International Labour Organization (ILO), which covers; freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, and the elimination of discrimination in respect of employment and occupation.

We believe that an integrated approach to human rights, by embedding it into our policies, business systems and processes, allows us to efficiently and effectively manage human rights within our existing ways of working. Our approach applies to all our employees and contractors. We focus on four areas where respect for human rights is particularly critical to the way we operate: labour rights, communities, supply chains and security.

Our contractors and suppliers are expected to conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions

of the ILO. The Pevale Supplier Principles further clarify the expectations we have from our suppliers and contractors on labour and human rights, including (but not limited to):

- no use of child labour;
- no use of forced, prison or compulsory labour;
- no payment of recruitment fees by workers;
- compliance with all applicable laws and regulations on freedom of association and collective bargaining;
- a safe, secure and healthy workplace and not tolerating discrimination, harassment or retaliation;
- compliance with all applicable laws and regulations on working hours; and
- providing wages and benefits that meet or exceed the national legal standards.

Risk assessment

Certain areas of our supply chain may pose a higher labour rights risk due to their location and the nature of the goods and services procured. Our risk assessment is based on country and category risk. Supply chain country risk is derived from external indices provided by the OECD that indicate the potential for modern slavery risks both in country, as well as for migrant workers from these countries. Supply chain category risk has been determined by analysis of typical contract work-scopes, identifying those such as branded merchandise and construction or maintenance services where there may be higher risks of unethical labour practices in the recruitment of migrant workers.

Pevale continues to strengthen its risk assessment to identify risks of modern slavery in our supply chains or where mitigations may be needed in our businesses, including in areas of new business development.

In the last year we ran a risk assessment review programme to improve our modern slavery risk assessment. Where the risk is high, a mitigation plan is developed.

Due diligence

We recognize the role of counterparty due diligence in bringing our commitments to life. In our supply chains, all direct suppliers undergo pre-contract screening, and this includes screening against sanctions lists and publicly available media where evidence of modern slavery and human rights abuse could be identified.

The results of these supplier assessments performed by Pevale's compliance team are summarised in a rating depending on the number and significance of any gaps between our requirements and the supplier's policies or performance. The most common shortcomings found during our supplier assessments typically relate to policy rather than performance gaps in the following areas:

- freely chosen employment;
 - child labour avoidance;
 - working hours, wages and benefits;
 - dormitory, housing and working conditions;
 - humane treatment, equal opportunities and freedom of association; and
- supply chain and performance management.
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Effectiveness and performance management

Through our procurement team's supplier qualification process, contractors or suppliers may be subject to on-site audits, which could be announced or unannounced, and which may be performed by either Pevale personnel or third-party auditors.

We investigate allegations of practices running contrary to the Pevale principles that are raised with us.

Training

With limited exception, Pevale staff undertake regular refresher training on our Code of Conduct and associated Ethics and Compliance policies. Training participation is documented, repetition cycles are clearly defined, and follow-up is automated.

In 2022, we continued to deliver a rolling programme of training for Pevale staff on our global procurement process, including guidance on when and how to undertake assessments of suppliers.

Matthew Lee

January 31st 2023
