

## **MODERN SLAVERY STATEMENT**

### **For the Financial Year 2020**

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Puma Energy (UK) Limited anti-slavery and anti-human trafficking statement for the financial year ending 31 December 2020.

#### **About Puma Energy**

Puma Energy is an integrated global energy company. We have a truly global reach with operations in 44 countries across the world, including around 2,500+ service stations, 34 terminals in our infrastructure business with a storage capacity of around 5.5 million m<sup>3</sup> and a global workforce of around 7,100.

Puma Energy (UK) Limited is wholly owned by Puma Energy Europe B.V (Netherlands). Puma Energy UK imports, stores and distributes clean fuels and Bitumen via Wholesale operations, it does not own any fuel retail forecourts. Puma Energy (UK) Limited employs 137 staff spread across its facilities.

Our business in the UK is divided into a Clean Fuels business and a Bitumen business.

#### **Clean Fuels Business**

The Clean Fuels business is headquartered at the Westerleigh terminal near Bristol. It operates 4 terminals at: Milford Haven, Westerleigh, Belfast (as a 50% joint venture with Nicholl Oils) and Theale, selling approximately 1.75 million tonnes of fuel a year, primarily to retail sellers (oil majors with forecourts such as Shell, BP and supermarkets), as well as agricultural and home heating use. This volume is approximately 3.5% of the total UK market.

Puma Energy (UK) Ltd receives its clean fuels primarily from its ultimate parent company into Milford Haven, for further distribution to other terminals by rail.

Milford Haven is one of the largest storage terminals in Europe and also stores fuel for other third parties.

Belfast primarily receives its supply from our parent company, although some material quantity (typically Jet Kerosene) is purchased directly from third parties.

#### **Bitumen**

The Bitumen business distributes bitumen to industrial users for use in road surface manufacture from storages based in the UK. Puma Energy (UK) Limited sells up to 300kt of Bitumen a year which is 20-25% of the UK Bitumen market, typically delivered to customer site by our contracted third party.

The Bitumen business operates from a small office in Paddington, London.

## Our Commitment

Puma Energy is committed to playing our role by ensuring that through our management and operations we have the systems, policies and processes in place to identify any potential instances of exploitation and, if found, eradicate modern slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for Puma Energy benefits from a working environment in which their fundamental human rights and dignity are respected and anyone that we do business with also upholds these principles.

## Our Purpose and Values

At Puma Energy, our purpose is to work with local people to energise communities and transform lives. We take pride in our role: listening, learning and sharing to raise standards, earn trust and help economies run better, solving problems and offering solutions that our customers need.

Our purpose is supported by our values:

<p><b>We are customer focused</b></p>	<p><b>We lead by example</b></p>	<p><b>We collaborate</b></p>	<p><b>We are agile</b></p>
<ul style="list-style-type: none"> <li>• We put our customers first</li> </ul>	<ul style="list-style-type: none"> <li>• Setting high standards, openness and trust, learning from feedback</li> </ul>	<ul style="list-style-type: none"> <li>• Using teamwork, mutual respect and accountability to build partnerships with our stakeholders and communities</li> </ul>	<ul style="list-style-type: none"> <li>• Embracing change and listening to ideas.</li> </ul>

Our values are demonstrated by our conduct every day and respect for human rights is embedded in our Code of Business Conduct. Our Code states: 'We Respect Others - Puma Energy and its employees respect the dignity, liberty and equality of everyone we work with – customers, vendors, suppliers and third parties alike. Our policies and procedures are based directly on the United Nations' Universal Declaration of Human Rights'. In pursuance of this, Puma Energy (UK) Limited is committed to preventing slavery and human trafficking in its own activities and in its supply chain by requiring suppliers to maintain ethical business practices and in particular to prevent slavery and human trafficking in their businesses.

## Our Supply Chain

In 2020, 100% of our diesel and gas oil, 80% of our refined fuels and 50% of kerosene were procured from our parent company – a company committed to eradicating modern slavery in its supply chain. Our non-oil procurement is through 578 suppliers with 92% based in the UK.

Although the risk in our supply chain is assessed as being low risk for modern slavery, we are committed to working with our supply chain to ensure that together we can work to eliminate any form of forced, bonded or child labour.

We want to work with suppliers who share our values and support us in delivering our purpose of energising communities. Each of our 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.

Puma Energy expects all suppliers and contractors to obey the national laws and international standards that require them to treat workers fairly, to provide a safe and healthy work environment and to protect environmental quality.

Any allegations of wrong doing raised are investigated and may result in suppliers being required to develop corrective action plans backed up by onsite audits. In addition, contracts may be terminated with immediate effect if suppliers' breach, or we suspect they are in breach, of the Puma Energy Supplier Code of Conduct.

Our focus, for the purpose of this declaration, is on our direct suppliers; however, we expect suppliers to share our expectations, as embodied in the Puma Energy Supplier Code of Conduct, throughout their own supply chains.

## **Governance and Policies**

### **Governance**

The Group's Ethics and Compliance Committee (ECC) is responsible for the general oversight of the implementation of the Code of Business Conduct. The ECC provides guidance to the business regarding compliance with the Code and investigates and addresses any complaints of breaches of the Code including with respect to human rights. The owner of the ECC is Global Head of Compliance, who reports directly to the CEO and the Chairman of the Board.

### **Policies and Procedures**

The following policies support us in mitigating the risks of modern slavery in our business and supply chain and are important steps in gaining supplier compliance. These policies are available to all employees on the company intranet.

#### **Code of Business Conduct:**

At the corporate level, Puma Energy's Code of Business Conduct applies to all employees of the group. The Code describes what we must do and how we must behave and requires our employees to treat all individuals with dignity and respect, eliminating unfair and/or unsafe labour practices.

#### **Supplier Code of Conduct:**

Puma Energy Supplier Code of Conduct addresses our commitment to seek out business partners who share our values and specifically prohibits our suppliers from using forced, bonded, involuntary, prison, or indentured labor.

We take violations of our Codes very seriously. For example, violations of the Supplier Code may result in termination of the supplier relationship, while violations of the Code of Business Conduct and Ethics may result in termination of employment.

### **Speak-Up Policy:**

The policy sets out our commitments to creating an environment, where all employees and third parties can speak up about suspected breaches and violations of our Code and accompanying policies. It details how any person working at or with Puma Energy, including those employed in our supply chain, can raise concerns or 'whistle blow' and the channels available to do so confidentially, responsibly and effectively and without fear of repercussions or retaliation.

The policy is supported by our dedicated helpline, in place for all employees and contract staff in Puma Energy and for third parties with whom Puma Energy has a business relationship (such as customers, suppliers, service providers). It allows them to raise concerns and report instances of potential non-compliance with our Code of Business Conduct, including respect for human rights, in full confidence and without fear of retaliation.

### **Diversity and Inclusion Policy:**

Ensures that we foster a fair and inclusive workplace, where our people are valued, their differences are respected, and discrimination is eliminated.

## **Risk Management**

### **Risk Assessment**

In 2020, we conducted a modern slavery risk assessment of the Puma Energy group of companies, the United Kingdom included. Our findings indicate that we do not supply any goods, globally or in the UK, that have been identified by the US Department of Labor <https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods> or the Global Slavery Index <https://www.globallslaveryindex.org/2018/findings/country-studies/united-kingdom/>, to be at higher risk of being produced by child or forced labor, reducing our risk.

Our Code of Business Conduct and other accompanying policies, and actions taken by the Company, such as employment clauses and background checks, further mitigate the risk.

The assessment indicated that as a company we will need to take steps to implement dedicated trainings for at risk functions on Modern Slavery, which we will implement in the current financial year.

### **Due Diligence**

Puma Energy's Supplier Due Diligence process requires that our suppliers comply with Puma Energy's Code of Business Conduct, make sure that they adhere to the requirements, require their own suppliers to respect equivalent standards, and pay particular attention to Human Rights standards including employees' working conditions.

Suppliers' compliance with the Supplier Code of Conduct is managed through our rigorous supplier onboarding due diligence process for all new suppliers. The questionnaire covers among many other aspects, questions on employee liberty, freedom of association and minimum age requirement.

While we are not currently verifying or auditing that all our suppliers comply with local laws regarding slavery and human trafficking, we will continue to assess our supply chain for areas of improvement in eradicating slavery and human trafficking, and will continue to expect our suppliers to do the same.

### **Training and Communication**

The Code of Business Conduct and its refresher training ensures that employees are familiar with the requirements of the Code of Business Conduct and the company policies. Further, in 2020 we conducted speak up training for all our employees, providing them with information on how and when to speak up.

Additionally, every new employee of Puma Energy (UK) Limited must complete an online training course, which includes a module on Speak Up.

### **Looking Forward**

At Puma Energy we remain committed to ensuring that we do business only in the right way, respecting all that work at or with us. We will continue to embed the principles through:

- Developing a dedicated Modern Slavery policy
- Providing further awareness training to employees whose functions are deemed at risk such as Procurement, Human Resources and Retail stations on ethical employment practices.
- Continue to monitor and take action to ensure zero tolerance in the supply chain.

### **Approval**

This statement has been approved by the Board of Directors of Puma Energy (UK) Limited. The Board has authorised a Director, **Roy Brooke** to sign the statement.

A handwritten signature in black ink, appearing to be "Roy Brooke".

Signed on behalf of Puma Energy (UK) Limited Roy Brooke

Director Date: 08 July 2021