

# Statement on modern slavery

For the financial year ending  
31 December 2023

4 May 2024



ConocoPhillips has a zero tolerance of modern slavery in all its different forms. This approach reflects a commitment to act ethically and responsibly in all business relationships and to ensure that modern slavery and human trafficking are not present in any part of our operations or in our supply chain.

ConocoPhillips supports and is committed to conducting its business consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

For further information about ConocoPhillips' responsible business practices, refer to the ConocoPhillips [Code of Business Ethics and Conduct](#).

## Our organisation's structure

This statement is made by ConocoPhillips (U.K.) Holdings Limited ("CPUKHL"), ConocoPhillips (U.K.) Marketing and Trading Limited ("CPUKMTL") and their subsidiaries. A full list of such companies is provided in Annex 1, Part A (together referred to as "ConocoPhillips UK"). This statement also covers the joint venture companies listed in Annex 1, Part B (the "NTHL Group") which own assets in the UK that are operated by a ConocoPhillips UK entity utilising ConocoPhillips UK employees, systems and processes. ConocoPhillips UK is part of the ConocoPhillips global organisation and the ultimate parent is ConocoPhillips (which is listed on the New York Stock Exchange). Further details of the organisation's structure and business can be found at [www.conocophillips.com](http://www.conocophillips.com).

The ConocoPhillips UK and NTHL Group entities which are covered by this statement, and which are listed in Annex 1, are collectively referred to as the "Group".

## Our business

CPUKHL has over 300 staff members in the United Kingdom. ConocoPhillips UK's London office is the headquarters for the European Commercial business from which its marketing and trading company, CPUKMTL, markets and trades crude oil, natural gas liquids and natural gas. The London office is also the centre for ConocoPhillips' global merchant LNG business. A ConocoPhillips UK company also operates the Teesside Terminal which processes unstabilised crude oil from multiple North Sea offshore fields and exports stabilised crude oil and NGLs, on behalf of the NTHL Group.



# Our supply chain

The Group's supply chain organisations are based in the UK and Norway. The types of goods and services sourced by the Group from direct or indirect suppliers and contractors include:

- Engineering equipment and services
- Maintenance services and spares
- Freight forwarding
- Utilities and waste management services
- Refrigerants and industrial gases
- IT equipment, software and services (including landlines and mobile phones)
- Storage services
- Labour and corporate services
- Cleaning and catering services
- Security services
- Fire prevention and response services
- Inspection services
- Engineering design services
- Health support services
- Industrial chemicals

In 2023, the Group had approximately 129 active contracts. Approximately 92% of our contracts for goods and services were with UK companies with the remainder located in Europe and North America and 97.7% of the total annual spend on goods and services was with UK companies.

# Our policies

ConocoPhillips' SPIRIT Values set the tone for how we behave with all our stakeholders. They are shared by everyone in our organisation and recognised throughout the industry. Click [here](#) to learn more about the ConocoPhillips SPIRIT Values.

ConocoPhillips has a long-standing commitment to comply with the law wherever we operate and to conduct all business activities with the highest ethical standards. We require suppliers to comply with certain requirements as a condition of business and employees and suppliers are



guided by the principles set out in the ConocoPhillips *Code of Business Ethics and Conduct* and the *Human Rights Position Statement*. The *ConocoPhillips Supplier Expectations* was developed to provide clarity to our suppliers regarding our expectations in this area.

## Modern slavery risks in operations and supply chain and due diligence processes

ConocoPhillips has an unwavering focus on safety, quality and sustainability in the selection and management of our suppliers and contractors. We strive for continuous improvement by developing rigorous sourcing and contracting strategies, having consistent and reliable supply chain standards and developing mutually beneficial partnerships with our suppliers and contractors. We regularly engage our suppliers through business reviews, supplier relationship management and supplier audits.

The Group reviews the risks of slavery and human trafficking in its businesses and supply chain and takes a risk-based approach to monitoring contractors', suppliers', and service providers' compliance with applicable laws, including those relating to modern slavery and human trafficking.

To manage the risk of modern slavery, new entrants to the Group's supply chain are made aware of the Group's standards in relation to this subject. In support of this, the Group's contract terms require contractors, suppliers and service providers to adhere to all applicable laws (including, specifically, those relating to human trafficking or modern slavery) and conduct their activities for the Group in a manner consistent with the Group's Code of Business Ethics and Conduct. There is an obligation on our contractors, suppliers and service providers to ensure their subcontractors do likewise.

The Group subscribes to the Magnet Joint Qualification System (JQS) Human Rights (HuRi) assessment tool, which assists in making supplier human rights reviews more efficient and effective in the energy industry.

This system offers an industry standardised assessment and allows for the sharing of results and thus eliminates duplication of supplier assessments. We assess our suppliers using a risk-based approach and in 2023, we further improved our internal review process whereby a team comprising representatives from supply chain, legal and compliance met regularly to discuss risks and alignment in this area.



All tankers that are scheduled to arrive to load crude oil and NGLs at the Teesside Terminal go through a vetting process. We utilise an internationally recognised inspection program administered by the Oil Companies International Marine Forum (*OCIMF*) to confirm vessels being considered for use have required certificates to trade internationally. During inspections, onboard conditions are observed to confirm the vessel is following international treaties and agreements, such as the Maritime Labour Convention, 2006 (*MLC*). Following each inspection, proprietary software is then used to screen a vessel before use, to verify the vessel meets minimum defined corporate standards.

## Effectiveness and performance management

The Group understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery in its operations and supply chain. The Group currently utilises its internal risk management and assurance processes for reporting actual or suspected ethics concerns to assess the effectiveness of the actions being taken, including in relation to the risk of modern slavery.

The Group conducts all procurement activities in an ethical manner in accordance with our Supply Chain standard and applicable laws. The Group's employees and management with direct responsibility for supply chain management are trained to recognise, investigate and report all exceptions to expected standards. Contractual audit rights provide a means of monitoring compliance with our contract requirements. We conduct supplier audits according to an annual plan based on an assessment of the perceived risk. Our procurement contract terms allow for termination with immediate effect if a contractor, supplier or service provider fails to comply with applicable laws or our rules and policies.

ConocoPhillips expects its employees and contractors to speak out when they see ethical lapses. There is a global helpline in place for all its employees, contractors, suppliers, and service providers to raise concerns and report instances of potential non-compliance with our Code of Business Ethics and Conduct, with full confidentiality and without any fear of retaliation. To help employees navigate the ethical choices they encounter in the workplace, ConocoPhillips has established Local Integrity Teams within most business units and functions. The Group has nominated "Integrity Champions" who are equipped with the tools to promote a culture of integrity, compliance and ethics on a local level, and serve as a resource for asking questions and raising concerns in good faith.

The Group is not aware of any incidents of slavery or human trafficking taking place in the business in 2023. The effectiveness of the steps the Group has taken to identify and prevent



modern slavery in its supply chain and its own business will be kept under review and further actions implemented where necessary.

## Training

The Group builds awareness of the Group's policies and statement on human rights and expectations among directors, employees, contractors, suppliers, and service providers. Employees annually receive training on the Code of Business Ethics and Conduct and are required to certify their compliance to its standards and disclose any exceptions.

Human Rights training is also available to all Group employees but is focused on individuals and functions most likely to experience issues related to human rights to ensure they understand the risks of modern slavery and human trafficking and assist with the effective implementation of our policies.

## Attestation

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 December 2023.

This statement has been approved by the Board of Directors of CPUKHL and CPUKMTL on behalf of the Group on 2 May 2024. A new statement will be published each year on the corporate website [www.conocophillips.co.uk](http://www.conocophillips.co.uk).

A handwritten signature in black ink that reads "M Rice - Jones".

Signed by:  
Malcolm Rice-Jones,  
Director

*For and on behalf of:*

- ConocoPhillips (U.K.) Holdings Limited
- ConocoPhillips (U.K.) Marketing and Trading Limited



# Annex 1

## Part A

### ConocoPhillips UK

- ConocoPhillips (U.K.) Holdings Limited
- ConocoPhillips (U.K.) Marketing and Trading Limited
- ConocoPhillips (U.K.) Teesside Operator Limited
- ConocoPhillips Treasury Limited

## Part B

### NTHL Group

- Norpipe Terminal Holdco Limited
- Norse Pipeline Limited
- Norpipe Petroleum UK Limited