

# Slavery and Human Trafficking Statement.

## *UK Modern Slavery Act 2015*

### **Introduction from the Administrator, Mr. Miguel Ángel Devesa**

CEPSA UK, Ltd. (hereinafter “CEPSA UK” or “the Company”) always aim to go one step further. That’s why the Company doesn’t just have solid values and act in an ethical way, but also has the relevant policies in place to assure we fulfil sector regulations.

CEPSA UK is committed to improve its practices to combat slavery and human trafficking. Cepsa Group in general and the Company in particular, take every care not to employ, either directly or through contractors, anyone under the age of 16, and does not tolerate any form of child labour or any type of forced labour or exploitation.

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

### **This statement is made in respect of CEPSA UK Ltd. (British incorporation)**

CEPSA UK Ltd is a provider of petrochemical products in the phenol and solvents sector.

CEPSA QUIMICA, our parent company, is the world’s leading producer of LAB (linear alkylbenzene) and the second global producer of phenol/acetate, backed by its technological leadership in both cases.

CEPSA QUIMICA is part of the Cepsa Group, an integrated company that operates throughout the oil and gas value chain. Cepsa has two main shareholders: Cepsa Holding, LLC, with a 61.36% interest, which is wholly owned by Mubadala Investment Company, and Matador Bidco, S.A.R.L., which owns 38.41%, and is wholly owned by The Carlyle Group. The Cepsa Group comprises nearly 10,000 employees from around the world who share our values of safety, sustainability, continuous improvement, leadership, and solidarity. The Cepsa Group is working on progressive internalization and is present in 21 countries in Europe, North America, Latin America, Africa, and Asia.

CEPSA UK is a solid and transparent company with an annual revenue of €25,159 million in 2023 (Cepsa Group).

## **CEPSA UK's business**

Our chemicals facilities (owned direct or indirectly by our matrix Cepsa Química, S.A.) in Spain, Canada, Brazil, Nigeria and China and oleochemical facilities in Indonesia and Germany.

The Company's products have several uses, including as raw material for detergents, resins, electronic parts, synthetic fibres and pharmaceutical products, among others.

Through CEPESA UK, wholly-owned subsidiary of Cepsa Química, S.A., we sale basic chemical products and derivatives to UK market.

CEPSA UK is committed to research, development and innovation to guarantee the sustainability of our industry and the quality of our products. We are present in the everyday lives of millions of people and in the value chain of virtually every industrial sector. We are strategically committing to circular economy criteria to rationalise the use of inputs in order to build a more sustainable, efficient and just world.

## **CEPSA UK's supply chains**

Cepsa Group works with close to 3,394 suppliers, which represent an outlay of €1,423 M in payments. We encourage sourcing from local suppliers because of its positive impact on the surrounding business landscape, not to mention the advantages this affords (facilitating supply, increasing flexibility and guaranteeing response times, in addition to making it easier to control country risk, etc.).

A key commitment of the Company's Sustainable Procurement Policy is to promote the best practices in the purchase and contracting of goods and services through responsible and sustainable management. Cepsa Group's Supplier Code of Ethics and Conduct furthers its commitment to ethics and transmitting values. The Company's specific procurement requirements are standardised and laid down into the General Contracting Terms and contractual models and must be accepted by any third party that does business with the Company during both the registration and the various tender award stages.

CEPSA UK stresses to all our suppliers the importance of good ESG performance in their own operations and of requiring similar standards within their own supply chains.

The Company uses an analytical process to identify specific areas requiring action and help forge partnerships to drive collaborative innovation and embed ESG criteria in decision-making.

## **CEPSA UK's policies on slavery and human trafficking**

CEPSA UK is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of our business. The Company's Human Rights Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

In addition to complying with the applicable laws of each country where it operates, and consistent with the Code of Ethics and Conduct, the Cepsa Group's Policy on Human Rights is in accordance with international laws and practices such as the Universal Declaration of Human Rights of the United Nations, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO), and the OECD Guidelines for Multinational Enterprises and taking into account what is set forth in the National Action Plan for Businesses and Human Rights of the Government of Spain, approved on July 28, 2017.

It applies to managers, directors and employees of the Cepsa Group, as well as its business partners, with regard to human rights and labour practices in all areas and communities where the Company operate.

The Cepsa Group expects and encourages its business partners to develop and implement ethics programs and standards that are aligned with the Company ones. In cases where CEPSA UK believes that such parties have failed to comply with its policies or their contractual commitments, it reserves itself the right to take the appropriate action.

CEPSA UK employees are responsible for ensuring the Company's integrity. Therefore, if a possible breach of the Code of Ethics and Conduct is detected, related to internal or external rules, each employee has an obligation to report it as promptly as possible through the available Helplines.

CEPSA UK will not tolerate any form of retaliation aimed at anyone who raises a concern in good faith about a possible breach of the Code of Ethics and Conduct or internal or external rules. No retaliation shall be allowed against anyone who assists in an Investigation into Non-compliance either.

On the other hand, persons who fail to comply with the Company's Code and Policies may be putting the Company at risk and as a result, may be subject to disciplinary action or penalties.

Each violation of the Policies and Code of Conduct is reviewed on a case-by-case basis and, where necessary, the appropriate disciplinary and corrective measures are applied in accordance with corporate policies and procedures and applicable laws.

### **Due diligence processes for slavery and human trafficking**

The Compliance and Ethics Operating Committee which consists of representatives from the following departments:

- Internal Audit, Compliance & Risk
- Legal
- Communications, Institutional Relations and Brand Marketing
- Health, Security, Safety, Environment and Quality
- Human Resources & Organization
- Finance & Administration,

Shall periodically review the applicable Policies and submit recommendations to the Board of Directors regarding any amendments or revisions as may be necessary or advisable to ensure its adequacy and effectiveness, taking into consideration the suggestions and input of the Ethics & Compliance Office and Cepsa Group employees.

CEPSA UK has a dedicated compliance team, the Ethics & Compliance Office, to carry out the adequate Due Diligence processes who shall ensure effective oversight, monitoring and control to identify any actions or behaviours that violate the standards and principles of the Human Rights Policy and the Code of Conduct.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.  
Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### **Supplier adherence to our values and ethics**

CEPSA UK has zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with its values, CEPSA UK requires them to have in place a rigorous supply chain compliance programme.

When selecting our suppliers, the Company:

- Gives preference, in its due diligence and selection processes, to suppliers and contractors having their own human rights policies or, in their absence, those that support the principles of the Cepsa Group Code of Ethics and Conduct.
- Requires its supply chain to formally adhere to the “Cepsa Group Suppliers Code of Ethics”, or to have adopted the principles embodied in the UN Global Compact.
- Establishes the appropriate communication channels with its suppliers and contractors that enable actual or potential breaches and violations to be reported.
- Demands respect for international principles and rules on the use of force, in particular the “International Code of Conduct for Private Security Service Providers” ([www.icoc-psp.org](http://www.icoc-psp.org)) considering that some activities of the Cepsa Group are conducted in high-risk and challenging environments that require the hiring of state-owned or private security companies.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the Company’s supply chains and business, CEPESA UK provides training to its employees.

CEPSA UK has an ethics and compliance training program, which includes Human Rights issues.

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Miguel Ángel Devesa

DIRECTOR  
CEPSA UK, LTD \_ Date: 28 June 2024