

Modern Slavery Act 2015 Transparency Statement FY2025

Introduction

This is a statement of PETCO Trading (UK) Limited ("PTUK" or "Company") in respect of the Modern Slavery Act 2015 compliance.

PTUK is committed to assessing the risk of modern slavery and human trafficking in our business and supply chain and we are working on developing new practices which aim to identify and mitigate such risks.

About PTUK

PTUK is a UK based wholly-owned subsidiary of PETRONAS Trading Corporation Sdn Bhd, which is a wholly-owned subsidiary of Petroliaam Nasional Berhad ("PETRONAS") the Malaysian state-owned national energy company.

The Company's business is to market, source and trade crude oil, petroleum products, gas and LNG internationally, with particular focus in the West of Suez markets (UK, Europe, Mediterranean, Caspian, West Africa and the Americas) for the PETRONAS Group.

Business and Supply Chain

Our employees have a hybrid working arrangement between the office and home. Accordingly, the key modern slavery risk areas are in our supply chain. Outside the primary business outlined above, the main categories of supply chain contracts of PTUK are in respect of office services, IT, professional services and business travel.

Policies and Risk Mitigation

PTUK is committed to ensuring there is no modern slavery or human trafficking in our business and supply chain and is committed to ensuring that it conducts its business in a manner that respects fundamental human rights and the dignity of all people. We are guided 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 Organisation ("ILO").

We strive to ensure that we work and maintain relationships with suppliers and customers who are recognised as being economically, environmentally and socially responsible. PTUK expects its partners to obey national and international standards that require the fair and ethical treatment of workers and employees and the provision of a safe working environment.

PTUK has an Anti-Modern Slavery and Human Trafficking Policy to guide the Company and its staff in tackling any prospect of slavery or human trafficking in the Company's business and supply chain, and has also adopted PETRONAS' Human Rights Policy in 2024. PTUK also applies the following policies in its business under the PETRONAS Group:

- Code of Conduct and Business Ethics ("CoBE")
- Anti-Bribery and Corruption Policy and Guidelines
- Whistleblowing Policy
- Recruitment Policy
- Equality Policy

The Company will continuously consider the above policies to determine whether any improvements can be made to assist with the detection and prevention of modern slavery and human trafficking in its business and supply chain.

The CoBE applies to every individual working for or on behalf of the entire PETRONAS Group. It underpins the mission, vision and values of PTUK and requires all employees to commit to the highest standards of integrity and professionalism, mandating that business affairs are undertaken in an ethical, non-discriminatory and transparent manner.

Know-your-customer ("KYC")

The Company has a thorough vetting process of counterparties which includes crew metrics for vessels. Our standard Group KYC questionnaire includes human rights questions where vendors and counterparties are queried on their human rights commitments, training to employees, grievance mechanisms for employees and compliance with laws and principles for the protection of human rights and prevention of modern slavery and human trafficking.

Contracts

We include in our contracts an anti-slavery clause mandating compliance with the Modern Slavery Act 2015 even if the contract is performed outside the UK.

Training

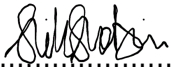
PTUK provides mandatory training on anti-slavery and human trafficking to its management and employees.

Key Performance Indicators

PTUK aims to have 100% of staff trained on anti-modern slavery and human trafficking, therefore new recruits are trained to maintain that 100% level, and periodical training will be given to all staff as a refresher.

Declaration

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes PTUK's modern slavery and human trafficking statement for the financial year ending 31 December 2025.

Signed: 

Name: Nik Mohsain Nik Ahmad

Position: Director

Date: 25 February 2026