

The Boards of Phillips 66 Limited and JET Retail UK Limited (each the “Reporting Entity” and together the “Reporting Entities”) have approved this Modern Slavery Act Transparency Statement in compliance with section 54 of the UK Modern Slavery Act 2015 (the “Act”) and have authorised its publication.

In 2025, the Reporting Entities maintained a range of policies, procedures, and practices designed to prevent and reduce the risk of forced labour and child labour across their activities and supply chains. These measures are applied broadly across all operations and are not limited to specific business segments or geographies. They address both forced labour and child labour risks and are directed at all suppliers and business partners. The Reporting Entities’ approach is underpinned by group wide standards established by Phillips 66 and includes policies and codes of conduct, employee and supplier screening processes, contractual safeguards, reporting mechanisms, and mandatory training. The key elements of this approach are outlined below.

Phillips 66¹ reports and discloses information regarding forced labour under the following legislation:

- Canada - [Fighting Against Forced Labour and Child Labour in Supply Chains Act](#)
- US (California) – [California Transparency in Supply Chains Act](#)
- United Kingdom – [Modern Slavery Act \(2015\)](#)

¹ “Phillips 66” is used in this report to refer to the businesses of Phillips 66 and its consolidated subsidiaries.

Structure, Activities and Supply Chains

Structure

Phillips 66 Limited and JET Retail UK Limited

Phillips 66 Limited is a wholly owned indirect subsidiary of Phillips 66 and has over 900 employees in the UK. It has several wholly owned UK subsidiaries; participates in two joint venture companies (in which it holds a 50% ownership interest and a 60% ownership interest respectively); and owns Qingdao Phillips 66 Energy Co. Ltd (a Chinese wholly foreign-owned enterprise) and a Swiss entity, Phillips 66 GmbH (in liquidation). During the first quarter of 2025 Phillips 66 Limited sold its 49% equity interest in a Swiss operating joint venture.

Phillips 66 Limited's supply chain activities relating to its UK business are conducted through its UK subsidiaries and UK joint venture companies and, in the majority, by Phillips 66 Limited.

JET Retail UK Limited is a wholly owned subsidiary of Phillips 66 Limited. It owns retail fuel sites through which it sells automotive fuels and other retail goods.

Activities

The Reporting Entities are wholly owned indirect subsidiaries of Phillips 66 and Phillips 66 Company and form part of the group's overall business activities.

Phillips 66 Company is an integrated downstream energy provider, with operations organised across the following business segments (which include activities carried out by its subsidiaries):

- **Midstream:** Provides crude oil and refined petroleum product transportation, terminaling and processing services, as well as natural gas and natural gas liquids (NGL) transportation, storage, fractionation, gathering, processing and marketing services in the United States. In addition, this segment exports liquefied petroleum gas (LPG) to global markets.
- **Chemicals:** Consists of a 50% equity investment in Chevron Phillips Chemical Company LLC (CPChem), which manufactures and markets petrochemicals and plastics on a worldwide basis.
- **Refining:** Refines crude oil and other feedstocks into petroleum products, such as gasoline and distillates, including aviation fuels. This segment includes 10 refineries in the United States and Europe.

- **Marketing & Specialties:** Purchases for resale and markets refined products, such as gasoline, distillates and aviation fuels, mainly in the United States and Europe. In addition, this segment includes the manufacturing and marketing of specialty products, such as base oils and lubricants.
- **Renewable Fuels:** Processes renewable feedstocks into renewable products at the Rodeo Renewable Energy Complex and at the Humber Refinery. In addition, this segment includes the global activities to procure renewable feedstocks, manage certain regulatory credits, and market renewable fuels.

Phillips 66 Limited

The principal activities of Phillips 66 Limited are the purchasing, processing, storage, distribution and marketing of hydrocarbon products. The reporting entity has three main operating divisions: Refining, Marketing and Commercial. The Refining division, comprising the Humber Refinery, refines crude oil and other feedstocks into finished petroleum products (such as gasolines, distillates, and coke) for UK consumption or export. The Marketing division sells refined products produced by the Humber Refinery as well as other purchased products into UK inland markets. The Commercial division sources feedstocks for Phillips 66 refineries, markets and sells their production for export markets, and trades in oil, products and other commodity markets.

JET Retail UK Limited

The principal activities of JET Retail UK Limited include the ownership of retail fuel sites and the retail sale of automotive fuel, EV charging and other goods. The business aims to provide customers with attractive and competitive fuel service station facilities under the JET fuel brand, alongside high-quality convenience and food-to-go offerings. Operations are delivered through a Company Owned Dealer Operated (CODO) model, whereby the retail fuel business is managed centrally (with JET Retail UK Limited being the fuel retailer) while dealers, as the retailer, oversee convenience and food-to-go operations. Significant investment is made in sites to ensure appealing, high-quality facilities for both fuel and retail customers.

Supply Chains

The Reporting Entities have global and geographically diverse supply chains, with a wide range of goods sourced across multiple jurisdictions. The majority of goods in the Reporting Entities' supply chains are hydrocarbon feedstocks and renewable feedstocks.

- In 2025, the majority of hydrocarbon feedstocks for the Phillips 66 Limited Humber Refinery was purchased from Europe (principally Norway). It should be noted that the purchase location is not always the same as the country of origin of the hydrocarbon feedstock.

- In 2025, the majority of renewable feedstocks for the Phillips 66 Limited Humber Refinery was purchased from Europe (principally Ireland). It should be noted that the purchase location is not always the same as the country of origin of the renewable feedstock.
- UK Procurement primarily sources maintenance routine operations spares and equipment for the Phillips 66 Limited Humber Refinery on a Delivered Duty Paid (DDP) basis through UK-based suppliers, meaning it does not act as the importer and country of origin is not always visible at purchase. Sourcing of other materials for the Humber Refinery is otherwise concentrated in mainland Europe and North America, with limited procurement from China restricted to the Low Sulphur Gasoline project. In relation to Jet Retail UK Limited, road transport fuels are predominantly supplied by the Phillips 66 Limited Humber Refinery, while non-fuel goods and ancillary goods and services are purchased from suppliers across Europe.

Policies and Governance Relating to Forced Labour and Child Labour

Across the Phillips 66 corporate group the following policies, as applicable, apply broadly to all the Reporting Entities, suppliers and employees:

- **Code of Business Ethics and Conduct:** At Phillips 66, our core values of safety, honor, and commitment, and ethics play a key role in every aspect of our business. We uphold the dignity of all individuals and recognize that governments have the primary responsibility for protecting human rights; however, we believe business also plays a significant role in fostering respect for human rights globally, as do other representative groups in civil society. We embrace the right of all people to live their lives free from social, political or economic discrimination or abuse.

Our operations are conducted in accordance with our Company values, ethics and policies. Specifically, we do not hold any person in slavery or servitude, or use forced or indentured labour, nor engage in human trafficking, and we endeavor to ensure our supply chains are free of such practices. Our key policies that reflect our intent regarding human rights include our recently updated Code of Business Ethics and Conduct.

- **Business Partner Principles of Conduct:** We expect our business partners and suppliers to adhere to our recently updated Business Partner Principles of Conduct. These principles require our suppliers to work in a manner aligned with

our values and the Phillips 66 Code of Business Ethics and Conduct. Key priorities include providing fair wages, ensuring non-discrimination, prohibiting human trafficking and modern slavery, opposing bribery and corruption, safeguarding data privacy and personally identifiable information and upholding all health, safety and environmental laws.

- **Supplier Standards:** The Phillips 66 procurement policy and the procedures of the procurement function govern the Reporting Entities' supply chain activities. Formal supplier vetting processes are used to protect individuals, ensure compliance with industry-standard frameworks for quality and monitor financial stability. Ongoing engagement with our suppliers supports the safe delivery of goods and services to our operations. Understanding and monitoring the work conducted by our suppliers and business partners is integral to efficient and robust business operations, sustainability, and respect for human rights.
- **Contract clauses:** Many of the contracts between the Reporting Entities and their respective suppliers include terms addressing human rights, including forced labour and child labour laws. Where possible, Reporting Entities seek to negotiate for the inclusion of Phillips 66's preferred human rights terms in contracts with suppliers.
- **Annual ethics attestation:** On an annual basis, every Phillips 66 corporate group employee is required to complete an attestation to confirm they have read the Phillips 66 Code of Business Ethics and Conduct and have disclosed any violations under it.
- **Phillips 66's Speak Up Policy:** A global version of the UK Whistleblowing Policy enables all Phillips 66 employees and other covered workers to confidentially report any concerns about misconduct, including potential breaches of law, company policy, or human rights standards such as modern slavery and human trafficking, without fear of retaliation. These reporting channels help ensure concerns are handled appropriately and support Phillips 66's broader commitment to ethical conduct, responsible operations, and respect for human rights across its activities and supply chains.

Risk-management processes used to assess and address modern slavery, forced labour, and child labour risks within the organisation's supply chains.

No organisation wide risk assessment was initiated in 2025. However, the Reporting Entities continue to monitor forced labour and child labour risks across their respective supply chains.

In 2025, the hydrocarbon feedstock and renewable supply chains were predominantly concentrated in Europe, with purchasing principally from Norway and Ireland.

This geographic purchasing footprint, combined with the application of established controls and supplier expectations, contributes to a comparatively lower inherent risk of forced labour and child labour within these supply chains. This is balanced by the recognition that certain areas, such as agricultural-based renewable feedstocks sourced from higher-risk jurisdictions, may present elevated risks that continue to be monitored and managed.

Contract labour is sourced exclusively through reputable employment agencies, with contractual provisions requiring adherence to the Business Partner Principles of Conduct and compliance with the UK Modern Slavery Act 2015. In addition, the Reporting Entities require that their suppliers immediately notify them if they become aware of any breach or potential breach of the UK Modern Slavery Act 2015.

The Reporting Entities reserve and will exercise their contractual rights in the event of any supplier non-compliance. In addition, supplier transparency is supported through consideration of whether commercial suppliers maintain clear or publicly available modern slavery policies, and, in the case of Phillips 66 Limited, through targeted reviews of renewable feedstock imports against recognised frameworks such as the ISCC scheme or verified supplier sustainability programmes. These measures are particularly relevant given the elevated inherent risk associated with agricultural supply chains in certain higher-risk jurisdictions, where low-skilled manual labour is more prevalent.

The Reporting Entities continue to keep their supply chain procurement practices under review so further enhancements can be made to reflect best practices in higher risk areas.

No reports of concern were raised during supply chain due diligence, by suppliers or by auditors of the Reporting Entities during the year ended 31 December 2025.

Steps Taken to Prevent and Reduce the Risks of Forced Labour and Child Labour.

In 2025, the Reporting Entities undertook the following measures to prevent and reduce the risks of forced labour and child labour in their activities and supply chains.

Supplier screening and monitoring: Phillips 66 is committed to verifying and monitoring its suppliers through its third-party due diligence process and via external data sources. By completing risk assessments, Phillips 66 has considered and keeps under review the risks of forced labour or child labour, and human trafficking, in its business and supply chains. This includes ascertaining if its suppliers have anti-slavery policies and identifying if they have an independent third-party certification, such as International Sustainability & Carbon Certification (ISCC), which would help mitigate these risks. The Reporting Entities' supplier screening and monitoring activities revealed no issues of concern related to forced labour and child labour in 2025.

- **Phillips 66 Speak Up Policy:** Phillips 66 encourages a culture of openness and accountability and expects employees and other covered workers to raise concerns about actual or suspected misconduct, including potential breaches of law, internal policies, or human rights standards such as modern slavery and human trafficking. Employees may raise concerns without fear of retaliation through established Speak Up channels, which are designed to ensure concerns are reported confidentially, taken seriously, and addressed appropriately in line with applicable law. This framework supports the Phillips 66 ongoing commitment to ethical conduct, responsible operations, and respect for human rights across its activities and supply chains.
- **Phillips 66 Ethics Helpline:** The helpline is available to employees, suppliers or any third-party to report ethics concerns anonymously in accordance with the Phillips 66 Speak Up Policy. The helpline is available online or by phone, 24 hours a day, 7 days a week. All reports are reviewed by the Global Ethics and Compliance team and are investigated appropriately. Reporting Entities received no reports related to forced labour or child labor activities in their supply chains for 2025.

Remediation measures

There were no cases identified or allegations of forced labour or child labour in the Reporting Entities' activities and supply chains in 2025, and thus no remediation measures were necessary.

Remediation of loss of income

There were no cases identified or allegations of forced labour or child labour in the Reporting Entities activities and supply chains in 2025, and thus no remediation measures were necessary.

A description of the training provided to employees on modern slavery, forced labour and child labour

General Ethics and Conduct

All new Phillips 66 employees are required to take online training on the Phillips 66 Code of Business Ethics and Conduct, which addresses Phillips 66's position on human rights. Thereafter, on an annual basis, every employee is required to complete an attestation to confirm they have read the Code of Business Ethics and Conduct and have disclosed any violations under it.

Modern Slavery Act 2015

Beyond the Code of Business Ethics and Conduct training, during 2025 no targeted training on forced labour and child labour risks or on the Act itself, was provided to employees /staff supporting the Reporting Entities.

Assessing the effectiveness

For the purposes of section 54 of the Act, the Reporting Entities did not undertake a formal effectiveness assessment in 2025. However, the Reporting Entities maintained oversight through ongoing third-party due diligence processes, which are reviewed and updated as appropriate, together with established reporting mechanisms, as set out in the Phillips 66 Speak Up Policy. These mechanisms enable concerns to be raised confidentially and without fear of retaliation and support the escalation and management of potential issues in line with the Reporting Entities' commitment to responsible business conduct.

In future reporting periods, the Reporting Entities aim to introduce more formal processes for assessing effectiveness, including, where appropriate, targeted training for relevant staff to support the assessment, management, and mitigation of the risk of forced labour and child labour risks in their activities and supply chains.

Any other information

No additional Information is considered relevant.

Approved by the Board of Directors of Phillips 66 Limited as our slavery and human trafficking statement for the year ended 31 December 2025.

Signed by Paul Fursey
Director
Phillips 66 Limited

Approved by the Board of Directors of JET Retail UK Limited as our slavery and human trafficking statement for the year ended 31 December 2025.

Signed by Rupert Turner
Director
JET Retail UK Limited