Modern Slavery Transparency Statement 2022

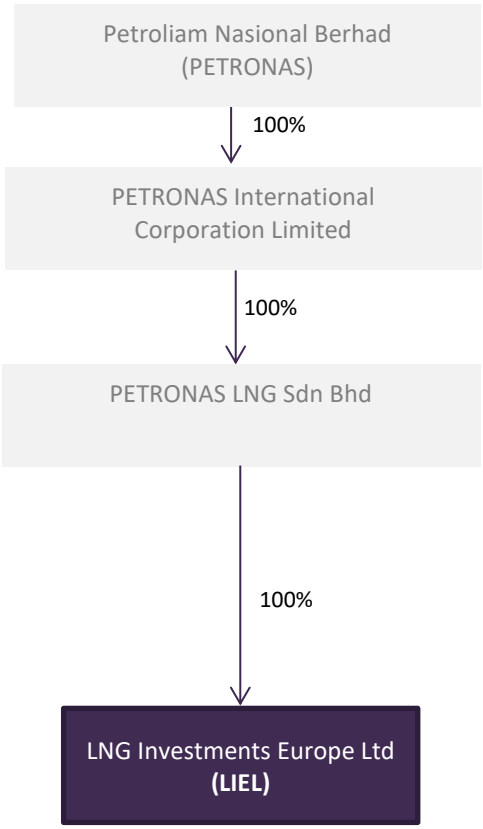
This is a statement of LNG Investments Europe Limited ("LIEL") under section 54 of the Modern Slavery Act 2015.

Introduction

LIEL is committed to assessing the risk of modern slavery and human trafficking in its businesses and supply chain. We are continuously developing our practices which aim to identify and mitigate such risks.

LIEL's Business

LIEL (highlighted in purple below) is part of PETRONAS, the National Energy Company of Malaysia.



LIEL's business is to source and buy LNG cargoes for delivery to the Dragon LNG Terminal. This activity is carried out by its affiliate company, PETCO Trading (UK) Limited ("PTUK"), on its behalf. LIEL then trades and sells regasified LNG from Dragon into the UK market through PTUK. LIEL does not have any employees, therefore, its business is carried out by employees of PTUK through service level and other intra-group agreements.

LIEL's Supply Chain

LIEL has no employees but is serviced by PTUK whose employees have a hybrid working arrangement between the office and home. Accordingly, the key risk areas are within LIEL's supply chain. Outside of the primary business of LIEL outlined above, the main categories of supply chain contracts of LIEL are in respect of office services, IT and professional services (including financial, legal and broker services). LIEL is undertaking the steps outlined below to mitigate its risks.

Policies and Core Values

In June 2017, LIEL adopted an Anti-Slavery and Human Trafficking Policy, as did PTUK. LIEL and PTUK ensure that this policy is fully communicated to all PTUK employees through internal training conducted by the Legal department.

LIEL is 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. LIEL 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.

In addition, LIEL has the following policies in place:

- Code of Conduct and Business Ethics ("CoBE")
- Anti-Bribery and Corruption Policy and Guidelines
- Whistleblowing Policy
- Recruitment Policy/Equal Opportunities Policy
- Procurement Policy

LIEL continues to review the above policies in order to determine whether any amendments should be made to assist with the assessment, prevention and mitigation of the risk of modern slavery.

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

Risk Mitigation in relation to Suppliers and Counterparties

LIEL seeks to work with suppliers, contractors and commercial counterparties who contribute to sustainable development and are economically, environmentally and socially responsible.

Prior to engaging new suppliers, contractors and commercial counterparties, which is managed by PTUK, 'Know Your Client' ("KYC") background checks are required. KYC checks can include additional questions aimed at identifying any risks of modern slavery and confirming that the counterparty has adequate procedures and policies in place to tackle the risk of modern slavery risks in their own businesses and supply chains. The standard PETRONAS Group KYC questionnaire includes a human rights section where vendors and counterparties are queried on their human rights commitments, training to employees, grievance mechanisms for employees and their awareness of the PETRONAS

Human Rights Commitment and its obligations. The PETRONAS Human Rights Commitment can be viewed at:
https://www.petronas.com/sustainability/social-stewardship/human-rights-commitment

Training

PTUK provides mandatory training on anti-slavery and human trafficking to its management and employees who conduct business on behalf of LIEL.

Key Performance Indicator (KPI)

PTUK has a KPI for 100% of staff to attend mandatory training annually.

Approval

This statement was approved by the board of directors of LIEL on 15 June 2023 for its financial year ending on 31 December 2022.

Signed: JO
Name: Jazlinawati Osman
Director, LNG Investments Europe Limited