

Modern Slavery Act Transparency Statement 2025

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 (the “Act”). It sets out the steps taken by PTT International Trading London Ltd (the “Company” or “PTTT LDN”) to prevent modern slavery and human trafficking in its business and supply chains.

Company overview

PTTT LDN is wholly owned by PTT Public Company Limited (PTT”), Thailand’s State-Owned Enterprise and National Energy Company. PTTT LDN is the flagship for international trading business of PTT in the Western corridor. The Company was incorporated on 24 October 2016.

The principal activity of PTTT LDN is the marketing and trading of crude oil and petroleum products. This physical trading is also supported by a derivatives trading desk, which helps to mitigate risks and limit exposure to market volatility. PTTT LDN purchases or acquires a competitively priced supply of crude oil and petroleum products to feed into the PTT group system and helps to optimise the trading activities of the group. In 2019, with our aspiration to support and serve all internal and external customer activities in the right place at the right time, we established an international chartering unit to provide spot and time-chartered vessel services for crude and petroleum products. The International Chartering unit has, however, been relocated to our sister company, PTT International Trading USA Inc. (“PTTT USA”). Recently, in 2025, the Company expanded its business scope to include Gas Trading Business such as Liquefied Natural Gas (LNG), enhancing its capability to support the Group’s diversified energy portfolio. PTTT LDN also seeks out and presents to the group new business flow opportunities by means of new investments and business partnerships.

Business objective and strategy

The Company’s objective is to expand trading activity in the western market focusing mainly on Europe, Mediterranean, West Africa, and Latin America. The Company plays a key role in connecting the trading network for our valued customers, partners and the PTT Group.

The Company operates under a global book management scheme by optimising economic trade flows among our head office in Bangkok, the eastern trading flagship in Singapore, and the western and American market. The Company, therefore, contributes to this global book by focusing its activities on the west.

Principles

PTTT LDN is committed to ensuring that management has an effective internal control system against modern slavery or human trafficking in its supply chains and in all part of its business, and endeavors to act with integrity in all its business relationships. To ensure this, robust controls are in place, and suitable policies have been adopted and continually updated and improved.

PTTT LDN's mission is to conduct business efficiently with good corporate governance. It aims to be a good corporate citizen by protecting the environment, improving the quality of life of the local communities and ensuring the long-term sustainability of the Company's growth. As such PTTT LDN is committed to ensuring that the working conditions in PTTT LDN's supply chain are safe, people are treated equally with respect and dignity, and the operating processes are socially and environmentally responsible.

PTTT LDN does not tolerate any form of modern slavery, forced labour, or human trafficking and is committed to acting ethically in all business relationships.

Policies

Since July 2018, as part of a suite of revised policies issued by PTT, PTTT LDN has adopted a Sustainability Management Policy, which was updated in December 2024 to reflect our commitment to continual improvement. The key attributes of the policy are to raise awareness among partnerships with global organisations, all employees and management, and stakeholders in order to achieve sustainable growth across three dimensions: Environmental, Social, and Governance along with promoting sustainable practices to reduce impacts throughout the value chain as follows:

Environmental	Driving business growth while achieving greenhouse gas emissions reductions to reach the net-zero target in a balanced manner, managing risks, capitalising on business opportunities, and effectively mitigating and adapting to climate change. This includes improving energy efficiency, strategic water resource management, controlling and reducing the impact of business operations on ecosystems and biodiversity, air pollution control, waste management, and applying the principle of a circular economy.
Social	Conducting the business responsibly. Respecting human rights principles. Protecting labour rights, safety, health, and improving working environment whilst continuously developing the knowledge, skills, and competency of employees.

	Applying organisational core competency to create shared values and improve the quality of life of the community and society for sustainable growth.
Governance	Complying with good corporate governance principles, ethics, laws, obligations, and regulations in all countries of operation and adhering to international practices and guidelines. Managing risk, adapting to change, and seeking opportunities to ensure sustainable business growth and reduce the impact of operations throughout the value chain.

In line with this commitment, the Company also has in place the Compliance Policy. This policy requires the Company to operate in full compliance with all applicable laws and regulations relevance to its business operations. Furthermore, it emphasizes respect for human rights and adherence to the principles of human rights law with a focus on upholding human dignity, rights, liberty and equality for all individuals. Moreover, the Company works closely with PTT to implement and embed compliance functions, with a particular focus on complying with laws relating to anti-bribery and anti-corruption including human rights. In addition, the Company establishes Corporate Governance, Ethical Standards and Code of Business Ethics Handbook ("CG Handbook"), which the Company committed to strictly abiding by Human Rights Principles and provide PTTT LDN personnel with knowledge and understanding of Human Rights Principles in order that they can apply such principles in their work. PTTT LDN shall not support any business that violates Human Rights Principles.

PTTT LDN is committed to conducting its business with honesty and integrity and expects all employees, agency workers, consultants, contractors, suppliers, directors and officers to uphold the same high standards.

Counterparties

Prior to entering a business relationship or engages with any counterparties, PTTT LDN requires each counterparty to undertake a thorough due diligence process. According to the Global Book Global Control principle, PTT's Trading Risk Control and Compliance Department, and Trading Credit and Contract Management Department are responsible for thorough counterparties assessment, rating, and registration. The assessment shall be conducted on both financial, legal and compliance aspects. Importantly, PTT's Trading Risk Control and Compliance Department undertakes to check and identify legal and compliance risks by using a global database for sanctions, anti-corruption, anti-money laundering and slavery and human trafficking. The counterparties' registration and approval are under the governance and authority of Trading Credit Committee ("TCC") which is appointed by PTT's Chief Executive

Officer. Eventually, PTT's Trading Credit and Contract Management Department will inform TCC's resolution to PTTT LDN. The business will commence after this stage.

At any point in time, if any compliance concerns are flagged, further information will be requested. After additional documents have been provided, PTT's Trading Risk Control and Compliance Department identifies the high level of risk and consults with PTT's Compliance Department and/or the Trading Credit Committee. PTTT LDN reserves the right to decline working with any suppliers.

In 2025, the Company formally adopted the Trade and Economic Sanctions Screening Procedures to strengthen its compliance framework and ensure effective screening against applicable sanctions requirements.

Risk assessment

In 2023, PTT PLC has undertaken a Human Right Risk Assessment ("HRRA") as an integral part of its comprehensive Human Right Due Diligence ("HRDD") process, aiming to scrutinize human rights issues pertinent to the company's business conduct and activities across its entire value chain (100%), which covers PTTTLDN. However, the assessment determined that, overall, there is a low risk of human right issues, included modern slavery and human trafficking. However, PTTT LDN aims to improve the indicators to evaluate Human Rights Risk in order to meet UK standards.

Training

As PTTT LDN is a small company in terms of the number of staff, the usual communication would be circulated internally, with relevant information shared electronically across the business. PTTT LDN instructed its employees after the statement was approved and established an annual assessment for all employees to raise awareness of and enhance understanding regarding Modern Slavery. All employees must acknowledge our CG Handbook as our guideline to enhance our measurements.

Effectiveness

We are focused on the high-risk parts of our business and supply chain, by improving our ability to notify and monitor modern slavery risk. We also recognise the role of our suppliers and address the issue. Currently there are no high-risk incidents that have occurred and over time, we believe that this will assist us in tracking more effectively our progress in identifying and monitoring the labour rights and modern slavery.

PTTT LDN believes that its existing arrangements are effective in ensuring that slavery and human trafficking are not taking in its business or supply chains.

This statement is made in relation to the financial year ended 31 December 2025 and was approved by the Board of PTTT LDN on 3rd June 2026.



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