
STATEMENT ON MODERN SLAVERY

CONOCOPHILLIPS (U.K.) HOLDINGS LIMITED

ConocoPhillips has a zero tolerance of modern slavery in all its different forms both in its business and its supply chain. This statement sets out the steps taken by ConocoPhillips (U.K.) Holdings Limited (“CPUKHL”) and the Group (see further “Our Business”, below) to prevent modern slavery and human trafficking in its business and supply chains.

OUR BUSINESS

Following a corporate restructuring, CPUKHL was incorporated in December 2018¹ and this is therefore CPUKHL’s first Modern Slavery Statement responding to the requirements of the Modern Slavery Act 2015 (“the Act”). There are a number of companies in the ConocoPhillips UK group, including CPUKHL and its subsidiaries and ConocoPhillips (U.K.) Marketing and Trading Limited (“CPUKMTL”). A full list of such companies is provided in Annex 1, Part A. This statement also covers the joint venture companies listed in Annex 1, Part B (the “NTHL Group”) which own assets in the UK which are operated by ConocoPhillips utilising ConocoPhillips employees, systems and processes. The entities in the UK which are covered by this statement and which are listed in Annex 1 are collectively referred to as the “Group”.

CPUKHL has over 300 employees in the United Kingdom. The Group’s London office is the headquarters for the European Commercial business from which its marketing and trading company, CPUKMTL, markets and trades crude oil and natural gas. The London office is also the centre for ConocoPhillips’ global merchant LNG business. ConocoPhillips in the United Kingdom also operates the Teesside oil terminal at Seal Sands, Teesside, on behalf of the NTHL Group. The Group is part of the ConocoPhillips global organisation and the ultimate parent is ConocoPhillips (which is listed on the New York Stock Exchange). Further details of the organisation’s structure and business can be found at <http://www.conocophillips.com/>

OUR APPROACH

The Group has zero tolerance of slavery and human trafficking in all their different forms in any part of its business and in its supply chain. The approach reflects a commitment to act ethically and responsibly in all

¹ In previous years, the Modern Slavery Statement for the ConocoPhillips companies in the United Kingdom was made by ConocoPhillips (U.K.) Limited (“CPUKL”). In 2019, CPUKL and certain of its affiliates and their respective exploration and production assets in the United Kingdom were sold. As CPUKHL and ConocoPhillips (U.K.) Marketing and Trading Limited were incorporated in December 2018 and ConocoPhillips (U.K.) Teesside Operator Limited in January 2019, this is the first Modern Slavery Statement on behalf of those entities, but not the other entities listed in Annex 1.

business relationships and to ensure that slavery and human trafficking are not present in any of its businesses or in its supply chain.

The Group supports and is committed to conducting its business consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

For further information about the Group's responsible business practices, refer to the ConocoPhillips [Human Rights Position Statement](#), the [Code of Business Ethics and Conduct](#) and the ConocoPhillips [Code of Business Ethics and Conduct: Supplier Expectations](#). The Group requires contractors, suppliers, and service providers to adhere to all applicable laws and to conduct their activities for the Group in a manner consistent with the aforementioned Statement and Codes.

The Group has a global helpline in place for all its employees, contractors, suppliers, and service providers to raise concerns and report instances of potential non-compliance with our Code of Business Ethics and Conduct, with full confidentiality and without any fear of retaliation.

MANAGING RISK IN THE GROUP'S SUPPLY CHAIN

The Group takes a risk-based approach to monitoring contractors', suppliers', and service providers' compliance with applicable laws, including those relating to modern slavery and human trafficking.

To manage the risk of modern slavery throughout the supply chain, new entrants to the Group's supply chain are made aware of the Group's standards in relation to this subject. In support of this, the standard contracts used by the Group's supply chain teams when entering into new contracts require contractors and suppliers to respect internationally recognised human rights, including those related to modern slavery.

Training is critical to ensuring the Group's respect for human rights is communicated to and observed by its own personnel and those throughout its supply chain. The Group builds awareness of the Group's policies and statement on human rights and expectations among directors, employees, contractors, suppliers, and service providers. Training is available to all Group employees but is focused on individuals and functions most likely to experience issues related to human rights.

LOOKING AHEAD

The Group understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery in the long term. In 2019/ 2020 the Group reviewed potential risks and implemented controls to manage these. It is expected that the nature of the risks may change over time and ongoing adaption by the Group will be required to deal with this.

To understand how effective its efforts are and to ensure modern slavery does not exist within any of its business activities in 2020/2021, the Group aims:

- To continue to implement and broaden supplier due diligence to support existing compliance arrangements and to identify and investigate any areas of concern in relation to modern slavery and human trafficking;
- To continue to deliver a programme of awareness training for functions most likely to encounter issues related to human rights, to help them continue to identify high risk factors and enhance their understanding of modern slavery compliance.

GOVERNANCE

This statement is made pursuant to section 54 of the Act and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 December 2019. It further outlines the Group's approach to deterring and tackling slavery and human trafficking.

This statement has been approved by the CPUKHL Board of Directors on behalf of the Group on 30 June 2020. A new statement will be published each year on the corporate website www.conocophillips.co.uk.



Manda Goodwin
Managing Director

June 2020

Annex 1

Part A

ConocoPhillips (U.K.) Holdings Limited
ConocoPhillips (U.K.) Marketing and Trading Limited
ConocoPhillips (U.K.) Teesside Operator Limited
ConocoPhillips Treasury Limited
ConocoPhillips (UK) Funding Limited

Part B

Norpipe Terminal Holdco Limited
Norsea Pipeline Limited
Norpipe Petroleum UK Limited