
STATEMENT ON MODERN SLAVERY

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”), ConocoPhillips (U.K.) Marketing and Trading Limited (“CPUKMTL”) and the Group (see further “Our Business”, below) to prevent modern slavery and human trafficking in their business and supply chains.

OUR ORGANISATION’S STRUCTURE AND BUSINESS

There are a number of companies in the ConocoPhillips UK group, including CPUKHL and CPUKMTL and their subsidiaries. A full list of such companies is provided in Annex 1, Part A (together referred to as “ConocoPhillips UK”). This statement also covers the joint venture companies listed in Annex 1, Part B (the “NTHL Group”) which own assets in the UK that are operated by a ConocoPhillips UK entity utilising ConocoPhillips UK employees, systems and processes. The ConocoPhillips UK and NTHL Group entities 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. ConocoPhillips UK’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. A ConocoPhillips UK company also operates the Teesside Terminal which processes unstabilized crude oil from multiple North Sea offshore fields and exports stabilized crude oil and NGLs, on behalf of the NTHL Group. ConocoPhillips UK 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 POLICIES

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 business relationships and to ensure that slavery and human trafficking are not present in any of its

operations 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](#).

SUPPLY CHAIN AND DUE DILIGENCE PROCESSES

The Group's supply chain organisations are based in the UK and Norway and mainly source goods from the UK and Europe. The Group only uses reputable firms to source labour. The Group regularly reviews the risks of slavery and human trafficking in its businesses and supply chain and 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.

The Group's higher risk activities include freight forwarding, use of customs agents and marine logistics. We have vetting requirements in place for vessels which should identify any concerns in the marine area, and we believe the supply chain measures outlined below adequately mitigate customs agents risks.

As part of its initiative to identify and mitigate risk in its supply chain, the Group utilises a risk management system, which was updated for the Group in 2020/2021. This system requires that new high-risk suppliers complete a comprehensive pre-qualification due diligence questionnaire, with an annual re-certification of certain existing suppliers. Where a risk is identified, enhanced due diligence is undertaken before the supplier is approved for use. This has strengthened our existing compliance framework by targeting the supplier's policies and procedures in relation to the prevention of modern slavery and human trafficking in their supply chains.

In 2021 we intend to subscribe to the Joint Industry Human Rights Assessment Service which is an assessment tool to assist in making supplier human rights reviews more efficient and effective in the energy industry. This Service is embedded within the existing EPIM Joint Qualification System which our supply chain already uses for prequalification of suppliers.

RISK ASSESSMENT AND MANAGEMENT

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 Group's contract terms require contractors, suppliers and service providers to adhere to all applicable laws (including, specifically, those relating to human trafficking or modern slavery) and conduct their activities for the Group in a manner consistent with the Group's Code of Business Ethics and Conduct. Contractual audit rights provide a means of monitoring compliance with our contract requirements. We conduct supplier audits according to an annual plan based on an assessment of the perceived risk.

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.

TRAINING

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. Employees annually receive training on the Code of Business Ethics and Conduct and are required to certify their compliance to its standards and disclose any exceptions. Human Rights training is available to all Group employees but is focused on individuals and functions most likely to experience issues related to human rights to ensure they understand the risks of modern slavery and human trafficking and assist with the effective implementation of our policies.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

The Group is not aware of any incidents of slavery or human trafficking taking place in the business in 2020. The effectiveness of the steps the Group has taken to identify and prevent modern slavery in its supply chain and its own business will be kept under review and further actions implemented where necessary.

GOVERNANCE

This statement is made pursuant to section 54(1) of the Act and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 December 2020. It further outlines the Group's approach to deterring and tackling slavery and human trafficking.

This statement has been approved by the Board of Directors of CPUKHL and CPUKMTL on behalf of the Group

on 28 May 2021. A new statement will be published each year on the corporate website www.conocophillips.co.uk

A J Goodwin

Manda Goodwin
Director

May 2021

Annex 1

Part A

ConocoPhillips UK:

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
Hydro Blue (UK) Limited

Part B

NTHL Group:

Norpipe Terminal Holdco Limited
Norsea Pipeline Limited
Norpipe Petroleum UK Limited