



Cheniere Marketing International LLP and Cheniere Marketing Ltd UK Modern Slavery Act Statement

Financial Year Ending 31 December 2021

1. Background

This statement is made by Cheniere Marketing International LLP (company number OC389850) ("CMI") and its wholly-owned subsidiary Cheniere Marketing Ltd (company number 08821369) ("CML"), in accordance with Section 54 of the UK Modern Slavery Act 2015 (the "Act").

As defined by the UK Government, "modern slavery" is the recruitment, movement, harbouring or receiving of individuals through the use of force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation. Modern slavery includes a range of exploitive practices, including, but not limited to, slavery, servitude, forced and compulsory labour, and human trafficking.

We respect the universally recognised human rights of all people, including our personnel, our suppliers, and the individuals based in communities in which we operate. Moreover, we remain fully committed to supporting the UK's efforts to eradicate modern slavery. Accordingly, this statement sets out our ongoing efforts to ensure that such practices are not occurring in our business operations, and to safeguard against any such practices occurring within our supply chain.

Additional information on our broader approach to business conduct and ethics, as well as our social risk and impact management practices, is provided via our [Corporate Responsibility webpage](#) and our [Governance Documents webpage](#).

2. Our Organisation and Supply Chain

CMI is a limited liability partnership, organised under the laws of the United Kingdom, and is an indirectly wholly-owned subsidiary of Cheniere Energy, Inc. ("Cheniere"). Cheniere is a publicly traded US-based energy infrastructure company primarily engaged in liquefied natural gas ("LNG")-related activities. As a full-service LNG provider, Cheniere engages in gas procurement and transportation, liquefaction, vessel chartering, LNG delivery, and related trading activities.

CMI engages in the international marketing of the LNG that is produced at Cheniere's LNG terminals, that is in addition to LNG sold under long-term sales contracts. CMI markets, sells, and ships such LNG to customers, providing LNG to international markets under flexible delivery and pricing terms. CMI also engages in both buying and selling LNG commercial transactions, which are executed on a short-, mid- or long-term basis, delivered on a "free on board" or "delivered at terminal" basis, and indexed to various pricing hubs, depending on customer needs. CMI also engages in financial commodities trading and undertakes shipping charters. These activities significantly expand CMI's service offering and capabilities as an LNG supplier. CMI's supply chain includes US-based natural gas purchases, physical LNG commodities produced directly by Cheniere, and a variety of commodities including bunkering, shipping, and service suppliers from around the globe.

CMI is the immediate parent and 100% owner of CML, an employing entity within the Cheniere corporate group limited by shares and incorporated and domiciled in the United Kingdom. CML acts as a service company to CMI and is responsible for providing the front, middle, and back office support necessary for CMI to manage its business operations.



3. Policies to address Modern Slavery

Cheniere is fully committed to conducting its operations in accordance with all laws and regulations applicable to the scope of its business activities. We are committed to the fundamental principle of fairness and are dedicated to operating in a manner that aligns with the highest ethical standards. In addition, our values are consistent with the principles and laws set out in the Act.

Cheniere is committed to maintaining effective processes and controls to combat modern slavery. This includes keeping our policy framework under regular review and making changes to the extent necessary to enhance our risk mitigation framework.

Both CMI and CML adhere to Cheniere's ethics and compliance-related policies. This includes the [Cheniere Code of Business Conduct and Ethics](#) ("Code of Conduct"), which all CMI and CML officers and employees are required to adhere to. The Code of Conduct reinforces our commitment to adhering to ethical standards and helps promote a culture of integrity.

In addition, Cheniere has a Supplier Code of Conduct, covering a range of ethical, compliance, health and safety, and regulatory issues. Suppliers are required to review, understand, and agree to abide by our Supplier Code of Conduct as part of our supplier prequalification process.

Cheniere also maintains processes, procedures, and systems to facilitate the reporting of potential ethical violations (including the reporting of potential violations pertaining to modern slavery). This includes a confidential hotline, which is accessible via a web-based reporting platform or via phone. Our hotline encourages the disclosure of unethical or unlawful behavior and is designed to protect individuals who lodge complaints or report violations. We strictly prohibit retaliation of any kind against individuals who have made good faith reports or complaints relating to known or suspected illegal or unethical conduct.

Finally, Cheniere reports on its corporate responsibility performance through multiple channels, including its annual Corporate Responsibility Report, Annual Report (Form 10-K), and proxy statement. These channels include CMI and CML (where relevant).

4. Due Diligence in relation to Modern Slavery in our Supply Chain

Cheniere strives to ensure that its suppliers comply with laws and regulations applicable to the scope of its business activities. We do not use forced labour, prison labour, indentured labour, bonded labour, or child labour in our operations, and we have proactively implemented procedures to safeguard against our suppliers using any of the foregoing.

Furthermore, Cheniere implements robust processes and procedures that enable the company and its affiliated companies to identify, assess, and mitigate modern slavery risks. This includes the following:

- **Supply Chain Management - Prequalification Process:** As part of our supply chain management process, our suppliers engage in a prequalification process that establishes our expectations for compliance with applicable labour, health, safety, and environmental laws and standards, including universal human rights-related standards.
- **Supplier Code of Conduct:** As set out above, during our prequalification process, suppliers are required to review, understand, and agree to observe the principles of our Supplier Code of Conduct, which addresses a variety of labour, human rights, ethics, compliance, health and safety, and regulatory considerations.

- **Quality Assurance:** We use quality assurance procedures to assess suppliers against our stringent compliance standards. Depending on the type of work conducted, this may include assessing labour practices, safety management and performance, drug and alcohol screening, business conduct and ethical practices, and comprehensive security and background checks.
- **Ongoing Due Diligence:** After onboarding suppliers, we continue to perform due diligence processes to monitor and identify potential ethics, compliance, and modern slavery-related risks. To the extent necessary, we engage our suppliers to gather additional information pertaining to health, safety, and labour practices arising during the course of their performance activities. In addition, we strive to negotiate audit provisions in our agreements which may support our ability to obtain additional information relating to supplier books, records, and performance activities (including, to the extent relevant, information relating to modern slavery-related matters).
- **Contract Lifecycle Process:** We have implemented contract lifecycle management processes, procedures, and automated systems that will help us to screen, monitor, report, analyze, and where possible, contractually enforce ethical, and human rights-related requirements applicable to our suppliers.
- **Know Your Counterparty Risk Management:** With respect to our LNG commercial activities, we engage in Know Your Counterparty (KYC) risk management processes which allow us to identify, assess, and monitor ethical, regulatory, and compliance risks applicable to our commercial counterparts. In doing so, we undertake a risk-based analysis that considers a variety of critical factors, including, but not limited to, jurisdictional risk, operating history, corporate structure, adverse or potentially adverse information related to a counterpart's business and ethical practices, trade and regulatory compliance requirements, product and service risk, financial records, and scope of engagement. Our KYC protocols are designed to align the degree of required due diligence and/or ongoing monitoring with the overall risk profile of a given commercial counterpart.
- **Contract Terms:** We strive to negotiate express terms and conditions in our contracts that compel our commercial counterparts to comply with applicable laws and ethical standards, including, as far as we are able, standards relating to human rights and modern slavery.
- **Accountability:** We maintain internal accountability procedures for employees, contractors, agents, vendors, and suppliers and it is our expectation that such individuals respect our values and comply with applicable ethical obligations, regulations, standards, and legal requirements.

5. Risk assessment and management of shipping-related risks

We assess the risk of modern slavery occurring within our supply chain to be low, as the substantial majority of our direct suppliers are based in jurisdictions which are recognised as having a low risk of modern slavery or are often themselves subject to stringent ethics and regulatory compliance standards. Nevertheless, we recognise that the shipping industry (a subset of our overall supply chain) has the potential to pose risks in relation to health, safety, ethics, human rights, collective bargaining, and labour law-related concerns. While we do not own or directly operate any LNG Carriers ("LNGCs"), we apply a range of measures to avoid and/or mitigate such risks when chartering LNGCs and/or when hosting third-party LNGCs at our facilities. These include the following:

- **Shipping contract terms:** The standard terms of our shipping agreements require our counterparts to comply with key international labour law requirements and standards applicable to seafarer's rights (including the standards of the International Transport Worker's Federation).

- **Shipping due diligence:** We engage in comprehensive due diligence processes and procedures through which we review extensive background information associated with our shipping counterparties (including the past and current ethics and compliance practices of such counterparties).
- **Marine assurance program:** In 2016, we implemented a stringent marine assurance program, which we have continued to evolve and enhance in response to industry risks. The program exceeds the requirements of industry programs to identify, assess, and monitor whether our shipping counterparts are continuing to operate in accordance with recognised standards and best practices including ethical, environmental, safety, and operational performance. Amongst other things, the program ensures that all LNGCs we charter or call at our facilities are routinely assessed for compliance with the IMO Maritime Labour Convention. This establishes international minimum standards for seafarer's rights and working conditions, including, but not limited to, wages, repatriation, employment contracts, and accommodation.

We acknowledge that the ongoing social and economic impacts of COVID-19 pose increased modern slavery challenges. Accordingly, we are continuing to monitor, assess, and mitigate modern slavery-related labor risks in our workforce and supply chain relating to the COVID-19 pandemic. In 2021, as part of our continuing response to the COVID-19 pandemic, a cross-functional team of senior leaders implemented numerous workplace controls and risk reduction measures to protect the health, safety, and wellbeing of personnel and suppliers at our facilities during several periods of elevated regional impacts from COVID-19, including the Delta and Omicron variants. Furthermore, we continued to coordinate with external medical advisors, adjust shift schedules and work location practices, restrict non-essential business travel, and require health screening practices in response to evolving local risks. With respect to our marine operations, our loading activities were modified in order to minimize COVID-19 exposure risks. In addition, we steered local efforts to provide free COVID-19 vaccinations to hundreds of shipping crews who arrived at our terminals from all around the world. Moreover, we cooperated with LNGC owners to facilitate crew changes, allowing crew members to not exceed the 11 months at sea threshold (e.g., maximum continuous period of shipboard service without leave) as established by the International Labour Organization (ILO) Maritime Labour Convention, 2006, as amended (MLC, 2006).

6. Training and Capacity Building

We provide targeted, comprehensive, and ongoing training to our workforce with respect to a variety of ethics and compliance issues, including issues relating to modern slavery. As part of our annual compliance and ethics training, all eligible employees certify that they have received, understand, and agree to adhere to the Code of Conduct.

In 2021, despite travel and workplace restrictions arising from the COVID-19 pandemic, key stakeholders and subject matter experts across our business (including representatives from our Legal, Compliance, Supply Chain Management, Commercial, Government Affairs, Sustainability, Human Resources, and Shipping units) continued to assess opportunities to enhance modern slavery-related controls, training, and awareness opportunities applicable to their functions.

In 2022, it is our expectation that we will develop and implement additional training activities as we continue to enhance the management of modern slavery risks applicable to our business activities.



7. Next steps

Our efforts to identify, assess and address modern slavery risks are ongoing and continue to evolve. In 2022, we will continue to monitor and assess our enterprise-wide activities in order to identify additional opportunities to enhance our performance in this regard. We will also continue to actively engage with our suppliers and commercial counterparts as part of these efforts. In addition, we will continue to examine risk management techniques and explore learning opportunities via industry channels and benchmarking exercises.

Furthermore, we are continuing to engage with our local communities. We have implemented social assessment processes, which help us to identify and prevent potential modern slavery impacts (applicable to our value chain) in the communities where we operate. In 2022, we will continue to explore additional opportunities to support local efforts to mitigate potential modern slavery impacts applicable to our operations.

Finally, we will continue to explore opportunities to further enhance our training program in order to strengthen employee awareness with respect to modern slavery considerations applicable to our business activities.

This statement has been reviewed and approved by authorised representatives of CMI on June 15, 2022 and the Directors of its wholly owned subsidiary CML on June 15, 2022, and constitutes our UK Modern Slavery Act Statement for each of those entities for the financial year ending December 31, 2021.

Cheniere Marketing International LLP

By: Eric Bensaude
Position: Managing Director

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Cheniere Marketing LTD

By: Corey Grindal
Position: Director

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