



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

Financial Year Ending 31 December 2023

## 1. Background

This statement is made by Cheniere Marketing International LLP (company number OC389850) ("CMI LLP") 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").

"Modern Slavery" is the recruitment, movement, harbouring or receiving of individuals using 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 where 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 LLP is a limited liability partnership, organised under the laws of the United Kingdom, and is an indirectly wholly owned subsidiary of Cheniere Energy, Inc. (collectively, Cheniere Energy, Inc. and its affiliates may be referred to as "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 LLP commercializes LNG produced at Cheniere's liquefaction facilities through sales and purchase agreements and individual cargo transactions. In addition, CMI LLP buys and sells other LNG volumes available in the market. LNG sales from CMI LLP can be made on a short-, mid-, or long-term basis and delivered on a "free on board" or "delivered at terminal" basis, and indexed to various pricing hubs, depending on customer needs.

CMI LLP also engages in portfolio optimization activities and undertakes shipping charters. These activities significantly expand CMI LLP's service offering and capabilities as an LNG supplier. CMI LLP's supply chain includes physical LNG commodities produced directly by Cheniere and a variety of commodities including bunkering, shipping, and service suppliers from around the globe.

CMI LLP 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 England. CML acts as a service company to CMI LLP and is responsible for providing the front, middle, and back-office and functional support necessary for CMI LLP to manage its business operations.

### 3. Policies to address Modern Slavery

Cheniere is committed to conducting its operations in accordance with all laws, regulations, and universally recognised human rights, which demonstrates an awareness of the interconnectedness of human rights issues and 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, with values 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 LLP 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 LLP officers as well as 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](#) ("Supplier Code") covering a range of ethical, compliance, health and safety, and regulatory matters, including human rights and Modern Slavery. In 2023, the Supplier Code was translated into four additional languages - Spanish, Chinese, German, and Italian - to make our Supplier Code of Conduct more accessible to our counterparties. This bolsters our approach to ensure our personnel, suppliers, and community stakeholders remain aware of the ethical standards that guide our business activities and the standards we expect of our suppliers.

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 LLP and CML (where relevant).

In 2023, through the Cheniere Foundation (our private, 501(c)(3) nonprofit charitable organisation), we made a modest charitable contribution to the Port Arthur International Seafarer's Center which provides substantial support to seafarers who arrive at our Sabine Pass facility. In addition, prior year donations were utilized to commission a van by the Corpus Christi Seafarers Center to see to seafarers' transportation needs while in port at Corpus Christi, Texas, USA. We will continue to explore additional opportunities to support local efforts to mitigate potential Modern Slavery impacts applicable to our operations.

### 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-, prison-, indentured-, bonded-, or child-labour in our operations, and we have proactively implemented procedures to ensure that this remains the case. Our suppliers are expected to comply with applicable laws pertaining to labour standards.

Furthermore, Cheniere has implemented comprehensive processes and procedures that assist the company and its affiliated companies in identifying, assessing, and mitigating Modern Slavery risks. This includes the following:

- **Supply-Chain Management - Supplier Onboarding Process:** As part of our supply-chain management process, our suppliers are expected to engage in a Supplier onboarding process that establishes our requirements for compliance with applicable labour, health, safety, and environmental laws and standards which uphold universally recognised human rights.

- **Supplier Code of Conduct:** As set out above, during our Supplier onboarding process, we expect suppliers to review, understand, and agree to observe the principles of our Supplier Code, which addresses a variety of labour, human rights, ethics, compliance, health and safety, and regulatory considerations, including an explicit prohibition of practices associated with Modern Slavery.
- **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 ethical, compliance, and Modern Slavery-related risks. In doing so, we employ risk-based strategies to prioritise and monitor suppliers that may pose additional risks due to the nature of services or business activities. To the extent necessary, and as far as we can do so, we engage with our suppliers to gather additional information pertaining to health, safety, and labour practices they have put in place to mitigate risks throughout their activities. In addition, we strive to negotiate audit provisions in our agreements that 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, analyse, 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 help us to identify, assess, and monitor ethical, regulatory, and compliance risks applicable to our commercial counterparties. 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 counterparty'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 counterparty.
- **Contract Terms:** We strive to negotiate express terms and conditions in our contracts that require 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, and suppliers, and it is our expectation that such individuals respect our values and comply with applicable ethical obligations, regulations, standards, and legal requirements.

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 managed by an independent third party, which is accessible to anyone via a web-based reporting platform or via phone, within the company or externally. Our hotline encourages the disclosure of unlawful or unethical behavior and is designed to protect individuals who lodge complaints or report violations. We prohibit retaliation of any kind against individuals who have made good-faith reports or complaints relating to known or suspected illegal or unethical conduct.

Furthermore, we are continuing to engage with our local communities. We have implemented and have continued to refine our social assessment processes, which helps us to identify and prevent potential Modern Slavery impacts in the communities where we operate.

## 5. Risk assessment and management of shipping-related risks

We continue to 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 that 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 increased 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 reduce 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 refine 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 International Maritime Organisation 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 engage in ongoing efforts to align our program with evolving IMO (International Maritime Organization) measures, which continue to be enhanced to improve conditions for seafarers. Importantly, these international regulations continue to evolve with the latest amendment to consider recommendations to prevent bullying and sexual harassment.

## 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 2023, we made Modern Slavery awareness training accessible to all Cheniere employees. In addition, we updated our third-party due diligence procedures (pertaining to certain intermediaries or agents who may provide services on our behalf) to further integrate Modern Slavery-related requirements into our due diligence activities.

In 2024, it is our expectation that we will continue to evaluate opportunities to enhance our training and awareness strategies as we strive to enhance the management of Modern Slavery risks applicable to our business activities.

## 7. Monitoring the Effectiveness of our Actions

We recognise that initiatives designed to address Modern Slavery risks across our operations and our supply chain should be monitored and measured on an ongoing basis to ensure their effectiveness and to drive continuous improvement. For fiscal year 2023, we can provide the following measures as indicators of our efforts:

### Code of Conduct Training & Modern Slavery Awareness Training

- In 2023, all Cheniere employees received comprehensive Code of Conduct training.
- In 2023, Modern Slavery Awareness training remained accessible to all Cheniere employees to be completed on an elective basis.

### Marine Assurance Program - Screening & Validation

- All LNGCs chartered in fiscal year 2023 were successfully screened and cleared pursuant to the Marine Assurance process. There were zero instances of Modern Slavery incidents identified or raised in connection with such reviews.

We recognise that Modern Slavery is a complex risk and seek to continuously improve our due diligence processes and controls pertaining to Modern Slavery risks to evolve along with emerging regulatory developments and supply chain risks. Moreover, we will continue to assess strategies to evaluate the effectiveness of our risk mitigation practices.

## 8. Next steps

Our efforts to identify, assess, and address Modern Slavery risks are ongoing and continue to evolve. In 2024, we will continue to monitor and assess our enterprise-wide activities 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 benchmarking exercises.

Finally, we will continue to explore opportunities to further enhance our training program 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 LLP on June 25, 2024, and the Directors of its wholly owned subsidiary CML on June 25, 2024 and constitutes our UK Modern Slavery Act Statement for each of those entities for the fiscal year ending December 31, 2023.

### Cheniere Marketing International LLP



By: Corey Grindal  
Position: Executive Vice President and  
Chief Operating Officer of Cheniere Marketing,  
LLC in its capacity as Managing Member of  
Cheniere Marketing International, LLP

### Cheniere Marketing LTD



By: Ramzi Mroueh  
Position: Director