

# MAKING SURE WE DO BUSINESS ETHICALLY

## BUSINESS ETHICS AND COMPLIANCE

Operating ethically and in compliance with both external regulations and our own rigorous internal standards is fundamental to managing risk and achieving operational excellence. As our business evolves, we continue to evaluate and update our compliance and ethics policies to address the applicable risks and provide appropriate guidance for our employees and business partners.

### Key issues and initiatives

**Code of Conduct and anti-corruption training and compliance:** Our [Code of Conduct](#) and Anti-Corruption and Economic Sanctions Policy outline our standards with respect to ethical behavior, accurate reporting, compliance with applicable regulations, reporting of violations and accountability. Our chief compliance and ethics officer and senior management review our [Code of Conduct](#) annually, which is then reviewed and approved by the board. We require all employees to participate in [Code of Conduct](#) training annually, and tie a portion of their compensation, through performance goals, to completing this training. We regularly audit compliance with our [Code of Conduct](#) and other ethics requirements.

Employees can report concerns through our hotline confidentially, with the option to remain anonymous, in their native or preferred language. Suppliers, customers and other third parties can also use our hotline to report concerns. We explicitly prohibit any form of retaliation against employees who make good-faith complaints, report a violation of the [Code of Conduct](#) or report other illegal activities. Any such retaliation will result in disciplinary action, up to and including termination.

**Anti-corruption program:** Our Anti-Corruption and Economic Sanctions Policy and our [Code of Conduct](#) govern our approach to eliminating the risk of corruption and bribery. We follow a robust anti-corruption due diligence process and closely monitor compliance with the process, which is independently audited on an annual basis. All employees are required to undergo anti-bribery and corruption compliance training at the start of their employment and at least annually thereafter.

**Respecting human rights and labor standards:** Cheniere respects the human rights of all people, including our personnel and individuals based in the communities in which we operate. We strive to work with suppliers, contractors and vendors who promote, embrace and comply with similar values. We prohibit the use of forced labor in our operations in compliance with applicable laws. Unless otherwise established by contract or required by applicable law, our

employees are employed on an at-will basis and have the right to terminate employment at any time, for any reason or no reason at all. In circumstances where employment arises via contract, we engage in efforts to ensure that such employment contracts comply with laws and fair labor standards applicable to the area of employment.

We do not employ child labor and comply with the employment age requirements set forth in the laws applicable to our operations. We review documentation for all new employees to ensure they are of legal working age. In 2020, no incidence of child labor was identified in our workforce. In addition, Cheniere strives not to purchase products or components thereof manufactured by persons younger than 15 years of age, or younger than the age of completing compulsory education in the country of manufacture where such age is higher than 15. We engage in efforts to ensure that our suppliers promote the same values (see [page 47](#)).

### CASE STUDY

Read additional case studies online:

[Managing cybersecurity risks](#)

# 100%

of eligible employees completed ethics and compliance training in 2020