

Modern Slavery Transparency Statement 2019

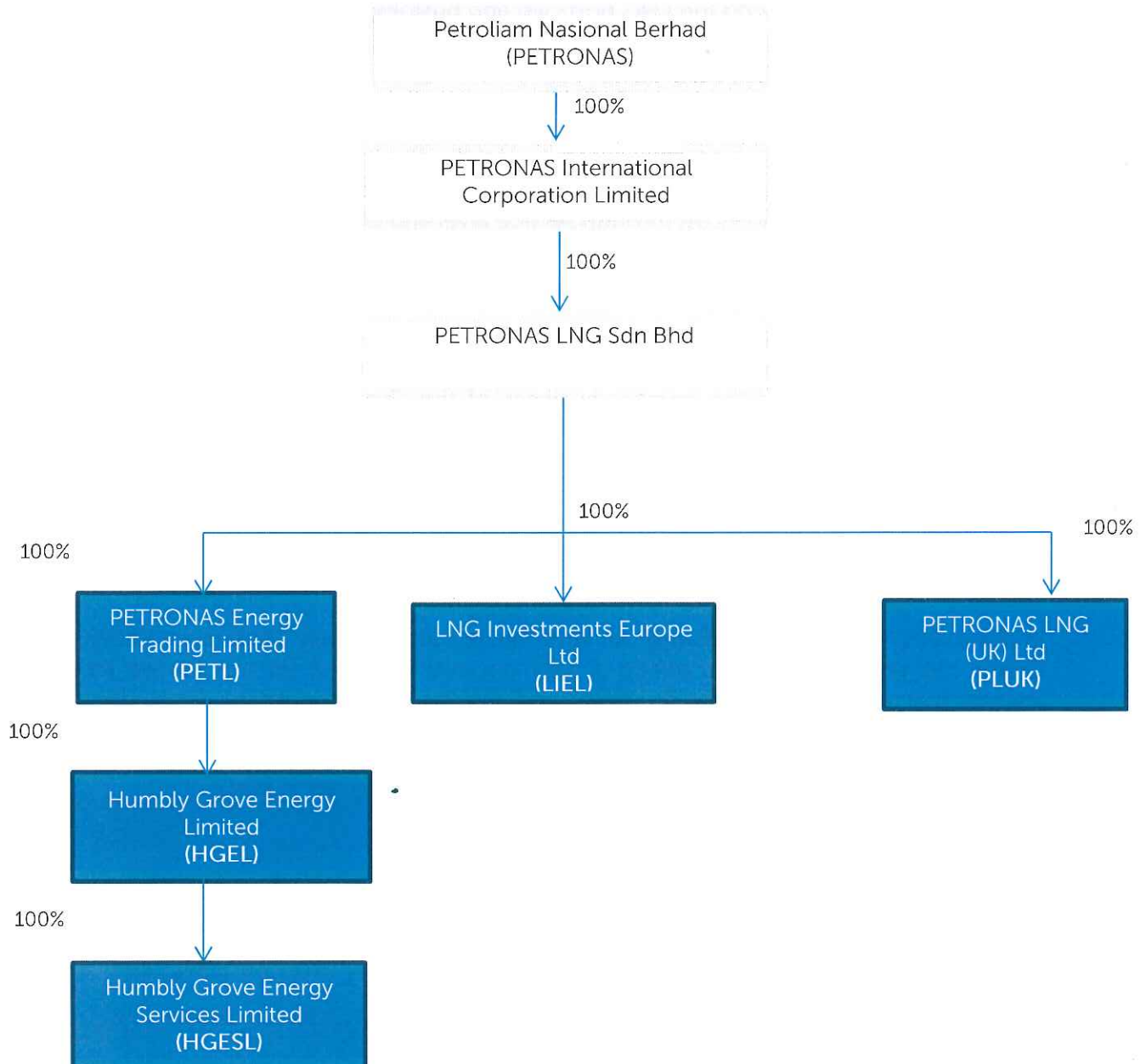
This is a joint statement of PETRONAS Energy Trading Limited ("PETL"), PETRONAS LNG (UK) LTD ("PLUK") and LNG Investments Europe Limited ("LIEL"). Details are also included on the steps undertaken by the subsidiaries of PETL (Humbly Grove Energy Limited ("HGEL") and Humbly Grove Energy Services Limited ("HGESL")) who do not individually meet the turnover thresholds under section 54 of the Modern Slavery Act 2015 (together, the "Group").

Introduction

The Group is committed to assessing the risk of modern slavery and human trafficking in its businesses and supply chain. We are continuously developing our practices which aim to identify and mitigate such risks.

The Group's Business

The Group (highlighted in blue below) is part of PETRONAS, the National Oil Company of Malaysia.



PETL's business is to market, trade and optimise natural gas in the UK and certain Northern European markets (such as Holland, Belgium and France). The natural gas it trades is primarily sourced from offshore producers in the UK and Norway, counterparties on the European marketing hubs on which it trades and from liquefied natural gas ("LNG") cargoes delivered to the Dragon LNG Terminal in Milford Haven by its sister company, PLUK.

HGEL, a wholly owned subsidiary of PETL, owns and operates the Humbly Grove Oil Production and Gas Storage Facility in Hampshire, providing gas storage services for the sole benefit of PETL. HGEL also produces, processes and sells crude oil from the reservoirs. HGESL, a wholly owned subsidiary of HGEL, provides gas pipeline services to its parent company and holds the transportation licence to transport natural gas between the Humbly Grove Gas Storage Facility and the National Grid network. HGEL and HGESL have contracts with a wide range of contractors and suppliers relating to the operation and maintenance of the Humbly Grove Oil Production and Gas Storage Facility.

PLUK's business is to trade LNG on a global basis, with particular focus on the Atlantic market. PLUK sources LNG from various counterparties and countries and its activities include sourcing LNG cargoes for delivery to the Dragon LNG Terminal in Milford Haven on behalf of LIEL, optimizing the LNG portfolio and business development activities within the Atlantic Basin. It also has the mandate to charter LNG vessels.

LIEL's business is to source and buy LNG cargoes for delivery to the Dragon LNG Terminal. This activity is carried out by its sister company, PLUK, on its behalf. LIEL then trades and sells regasified LNG from Dragon into the UK market through its sister company, PETL. LIEL does not have any employees, therefore, its business is carried out by employees of PETL and PLUK through service level and other intra-group agreements.

The Group's Supply Chain

Employees of the Group are primarily office-based save for certain employees who operate the Humbly Grove Facility. Accordingly, the key risk areas are within the Group's supply chain. Outside of the primary business of the Group outlined above, the main categories of supply chain contracts of the Group are in respect of office services, IT, business travel and professional services (including financial, legal and broker services). Each member of the Group is undertaking the steps outlined below to try to mitigate this risk.

Policies and Core Values

In June 2017, the Group adopted an Anti-Slavery and Human Trafficking Policy. The Group has ensured that this policy is fully communicated to all employees through internal training conducted by the Legal and Compliance department. Both electronic and hard copy versions of the policy were distributed to employees after training.

In addition, each member of the Group has the following policies in place:

- Code of Conduct and Business Ethics ("CoBE")
- Anti-Bribery and Corruption Policy and Guidelines
- Whistleblowing Policy
- Recruitment Policy/Equal Opportunities Policy

- Procurement Policy

The Group continues to review the above policies in order to determine whether any amendments should be made to assist with the assessment, prevention and mitigation of the risk of modern slavery.

CoBE, which applies to every individual working for or on behalf of the entire PETRONAS group, underpins the mission, vision and values of the Group. It requires all employees to commit to the highest standards of integrity and professionalism and mandates that business affairs are undertaken in an ethical, non-discriminatory and transparent manner.

The Group is committed to ensuring that it conducts its business in a manner that respects the fundamental human rights and dignity of all people by observing the Universal Declaration of Human Rights and the United Nations' Guiding Principles on Business and Human Rights, amongst others.

Risk Mitigation in relation to Suppliers and Counterparties

Each member of the Group seeks to work with suppliers, contractors and commercial counterparties who contribute to sustainable development and are economically, environmentally and socially responsible.

Prior to engaging new suppliers, contractors and commercial counterparties, each member of the Group undertakes "Know Your Client" ("KYC") background checks. The Group's KYC checks include additional questions aimed at identifying any risks of modern slavery and confirming that the counterparty has adequate procedures and policies in place to tackle the risk of modern slavery risks in their own businesses and supply chains.

The Group, where possible, seeks the inclusion of clauses providing assurances around mitigating the risk of modern slavery in its new or renewed commercial and supply agreements. In addition, it is already Group policy to ask counterparties to acknowledge CoBE and to provide counterparties with a copy of the same.

Training

At the start of 2018, PETL's Legal and Compliance department gave training on modern slavery to PETL, PLUK and HGEL staff. This training included a background to the Modern Slavery Act 2015, key risk areas for the Group's UK entities, information to be requested during KYC, clauses to be included in standard commercial and supply contracts, details of the Group's Anti-Slavery and Human Trafficking Policy adopted in 2017 and advice on how to respond to a suspected incident of modern slavery.

Approval

This statement was approved by the board of directors of PETL on 28th May 2019, PLUK on 29th May 2019 and LIEL on 28th May 2019. PETL, PLUK and LIEL's financial years ended on the 31st of December 2018.

Signed 

Mohamed Fasluddeen Abdul Hadi
Director & CEO, PETRONAS Energy Trading Limited

Signed 

Mohamed Fasluddeen Abdul Hadi
Director, PETRONAS LNG (UK) Ltd

Signed 

Mohamed Fasluddeen Abdul Hadi
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