



By Appointment to Her Majesty The Queen
Suppliers of Liquefied Petroleum Gas
Calor Gas Limited Warwick



By Appointment to His Royal Highness The Prince of Wales
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CALOR

CALOR GAS LIMITED

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**Modern Slavery Act
Statement for 2023**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015.

It sets out the steps that Calor Gas Ltd ("Calor") has undertaken, and will continue to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Calor has a zero tolerance approach to any form of modern slavery. We are committed to acting in an ethical manner, with integrity and transparency in all business dealings. We endeavour to ensure that effective systems and controls are in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our organisation

Calor supplies Liquid Petroleum Gas (LPG) and Liquefied Natural Gas (LNG) to commercial and domestic customers throughout Great Britain. LPG can be supplied either via a portable cylinder or by a bulk tank, stored on the customer's property. LNG is distributed by tanker for use either as transport fuel or for industrial customers. Calor is wholly owned by the Dutch company SHV Holdings and only trades within mainland Britain. The LPG and LNG sold by Calor is supplied either by the Dutch parent company or from refineries in Great Britain.

Calor's financial year runs from January-December.

Our business

We recognise that the greatest risk of modern slavery is with those not in permanent employment and work closely with service providers to ensure this risk is being managed appropriately. All agency employees have access to our well-being suite and assistance programmes and Calor have full visibility of all agency workers to mitigate any risk of modern slavery. Our relationships with all service providers are reviewed regularly and are subject to robust procurement processes and contracts. Within national contracts, vetting policies and procedures are aligned with our own and these are continually reviewed as part of ongoing performance management.

Employees are also able to share concerns confidentially using our 'speak up' anonymous phone line and web-portal.

In-bound supply chain

Calor regularly reviews high spend and critical suppliers and on this basis, considers the highest risk areas to be those suppliers that operate internationally in countries of concern with regards to human rights. To manage this risk, we continue to work closely with our parent company to audit suppliers and evaluate the effectiveness of existing controls. Our newly launched supplier platform mandates all suppliers to accept the business partner code of conduct which includes a section on workers welfare around Modern Slavery.

Chartered vessels transporting LPG and LNG were identified as another area of risk. To manage that risk Calor confirmed that all charter agreements are arranged via our parent company to ensure all trading and imports meet the criteria and include terms of employment for the vessels staff and crew. Acceptance Rules and Guidelines are also in place for every charter party, specifying that all shipboard personnel shall have relevant levels of training and comprehension of the English language.



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Our business partner code of conduct outlines the expectations all new and existing suppliers must meet with regards to modern slavery and wider sustainability topics.

Our distributors

Distributors play a key role within our supply chain and to ensure that these organisations operate in accordance with our expectations and the requirements of the Modern Slavery Act 2015, we will continue to review certain relationships to scrutinise the supply, sourcing and distribution arrangements. Distributors are subject to contractual arrangements and code of conduct expectations.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. A copy of these policies is available upon request. They include:

1. Business Partner Code of Conduct
2. Ethical Trading Policy
3. Employee Code of Conduct (which includes whistleblowing and equal opportunities)
4. Environmental Policy
5. Anti-Bribery and Corruption Policy
6. Privacy Policy

All supplier relationships are subject to contractual terms and conditions. In addition to this, we also perform various Third-Party Due Diligence checks for suppliers that meet criteria outlined by our Compliance Function. Calor continues to review the risks in this space by utilising a risk management tool that flags any risks with existing suppliers. For potential new suppliers, these due diligence checks are completed before engagement takes place.

We may terminate our relationship with suppliers/individuals working with/for us/on our behalf, if they breach these policies.

Our performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain by use of targets, relating to areas such as:

- Development and completion of relevant training where appropriate
- Compliance with the supply chain and employee code of conduct
- Strengthening of work with high spend and critical suppliers
- The level of communication and personal contact with next link in the supply chain
- The completion of audits

Responsibility for this policy

The prevention, detection and reporting of modern slavery at Calor or in our supply chain is the responsibility of all of those working for us.

The Calor Management Team has overall responsibility for this policy and for governing the Company's compliance with all of its legal and ethical obligations.

Approval for this statement

This statement was approved by the Calor Management Team.



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Tom Dillon
Chief Financial Officer
Date:

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