

## Modern Slavery Act

### Statement for 2025

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, and we endeavour to ensure that effective systems and controls are in place to safeguard against any form of human rights abuses.

### Our organisation

Calor distributes Liquid Petroleum Gas (LPG) and BioLPG to commercial and domestic customers throughout Great Britain. These fuels can be supplied either via a portable cylinder or by a bulk tank, stored on the customer’s property. Calor is ultimately owned by the Dutch company SHV Holdings and only trades within mainland Britain. The LPG and BioLPG sold by Calor is supplied either by entities controlled by the Dutch parent company or from oil refineries in Great Britain. Our third-party supply points in Teeside, Mossmorran and Grangemouth, however, all exclusively supply LPG of North Sea Natural Gas Liquid Origin (meaning not oil refinery production).

Our UK supply contracts are subject to our normal agreements and controls including our Supply Chain Code of Conduct.

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 we work closely with service providers to ensure this risk is being effectively managed. We ensure that any entity providing resource to Calor is subject to robust procurement processes, contractual terms and regular evaluation.

As of 2024, Human Resources have taken over the ownership of our largest agency work supplier from the Operations team, which has strengthened our controls against modern slavery. All agency suppliers sign up to recruitment policies, and agency workers are subject to the same pre-employment checks as permanent employees. In addition, they receive equal access to facilities, job opportunities, and pay parity from the first day of employment. Contracted employees also have access to our assistance and whistleblowing programmes. Agency supply contracts are reviewed annually, and suppliers are subject to weekly performance management reviews as per their SLAs. Within national contracts, vetting policies and procedures are aligned with our own and these are continually reviewed as part of ongoing performance management. Finally, our largest provider of temporary labour is subject to a quarterly business review and is governed by a bespoke contract with additional controls.

Employees can share concerns anonymously using the ‘Speak Up’ system. ‘Speak Up’ is the confidential reporting service of SHV and its groups, and any employee or contractor working with Calor has access to the tool. Reports can be submitted via telephone or online, or, alternatively, colleagues can voice concerns with the Compliance Lead. All personnel are provided with all this information during the induction process as a constituent of the electronic learning modules that newly hired employees must undertake.

## **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 with human rights concern. To manage this risk, we continue to work closely with our parent company to audit suppliers and evaluate the effectiveness of existing controls. Our supplier platform mandates all suppliers to accept the Business Partner Code of Conduct, which includes a section on workers' welfare around modern slavery and our expectations around wider sustainability topics. Those that do not have access to the platform will be sent a copy to accept before we conduct business with them, thereby ensuring that all our suppliers have accepted these terms. In 2024, we strengthened our standard procurement terms and conditions to include an obligation on suppliers to comply with all slavery and human trafficking laws and Calor's policies relating to preventing modern slavery.

Chartered vessels transporting LPG and BioLPG were identified as another area of risk. To manage that risk Calor confirmed that all charter agreements are arranged to ensure all trading and imports meet the criteria, include terms of employment for the vessels' staff and crew and comply with the Maritime Labour Convention. Acceptance Rules and Guidelines are also in place for every charter party, specifying that all shipboard personnel must have relevant levels of training and comprehension of the English language. We do not import goods from Russia, and our suppliers do not use Russian-flagged vessels. We do not conduct business or activity in any way with 'Heavily Sanctioned Countries', listed in the Trade Sanctions & Trade Controls Manual. This forms part of our commitment to ethical sourcing and the prevention of modern slavery.

## **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 several 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. Employee Code of Conduct (which includes whistleblowing and equal opportunities)
3. Environmental Policy
4. Anti-Bribery and Corruption Policy
5. Privacy Policy
6. Procurement Policy

All supplier relationships are subject to contractual terms and conditions. Most contracts are based on Calor's standard procurement terms and conditions, which were last updated in January 2024. If we enter into a contract using bespoke terms, Group Legal ensure that the contract includes sufficient obligations around modern slavery and human trafficking.

Furthermore, this year, Calor have strengthened our contractual coverage of our cylinder supply chain. In addition to this, we 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 monitors existing suppliers. For potential new suppliers, these due diligence checks are completed before engagement takes place. Once a supplier is in the tool, the Compliance Lead is automatically notified if there are any concerns in relation to human rights and/or modern slavery.

Calor reserves the right to terminate our relationship with suppliers/individuals working with us, or on our behalf, if they breach these policies.

### **Our performance indicators**

We will assess the effectiveness of our actions to prevent modern slavery within our business and supply chain by setting measurable targets in areas such as:

- Compliance with our Supply Chain and Employee Codes of Conduct
- Enhanced controls over high-spend and critical suppliers
- Quality and frequency of communication with the next tier of the operational chain
- Completion and findings of supply chain 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 its legal and ethical obligations.

### **Approval for this statement**

This statement was approved by the Calor Management Team.

Signed:



**Rogerio Lopes** (Chief Executive Officer)

Date: 25/06/25