

Modern Slavery Act

Statement for 2026

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 are in Teesside, 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 Business Partner 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.

Human Resources retain the ownership of our largest agency work supplier and our controls against modern slavery remain high priority. 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 as a Living Wage accredited employer we ensure agency workers are subject to the same entitlement as permanent employees. Agency workers also have access to our assistance and whistleblowing programmes. Agency supply contracts are reviewed regularly, and suppliers are subject to 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 raise concerns anonymously using the ‘Speak Up’ system. ‘Speak Up’ is the confidential reporting service of SHV and its group companies, available to all employees and contractors working with Calor. Reports

can be submitted via phone or online, or concerns can be shared directly with the Compliance Lead. This information is covered during the induction as part of the mandatory e-learning modules for all new hires.

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 on-boarding 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 compliance 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. 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
7. Trade Sanctions & Trade Controls 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, 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 assess the effectiveness of our actions to prevent modern slavery within our supply chain using the following metrics, which set out the key performance indicators applied in this area together with our current level of performance against each measure.

KPI	Performance
% of suppliers aligned to our Business Partner Code of Conduct	100%
% of spend covered by contracts containing modern slavery clauses	82%
% of spend covered by enhanced risk assessments	90%

Responsibility for this statement


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 statement, and for governing the company's compliance with all its legal and ethical obligations.

Approval for this statement

This statement was approved by the Board of Directors of Calor Gas Limited.

Signed:



Rubens Ramos (Director and Chief Executive Officer)

Date: 25/06/2026