Centalion

Modern Slavery Policy

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1.
DEFINITION AND STATEMENT

The United Nations defines modern slavery as encompassing practices such as forced labour, debt bondage, forced marriage and human trafficking. It refers to situations of exploitation where a person cannot leave because of threats, violence, coercion, deception and/or abuse of power. According to the ILO, this concerns 50 million people worldwide.

Centalion has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically and with transparency in all its business relationships. In line with its commitment to respect internationally recognised human rights, Centalion deploys due diligence systems to ensure that modern slavery and human trafficking are not taking place in its value chain.

2.
OUR STRUCTURE AND SUPPLY CHAINS

Centalion moves physical energy from where it is sourced and stored to where it is demanded most, using the most logistically efficient means possible: ships, rail, trucks and pipelines. While Centalion has historically been an oil trader, our company ultimately trades what is tradeable and what the market demands. Biofuels, natural gas, and renewables today account for about half of our trading volumes.

As commodity trader, Centalion has numerous business partners across its activities, including a large number of suppliers. Based on regular risks assessments conducted both internally and with the help of external experts, Centalion understands that it is mostly within these supply chains that there are risks of modern slavery.

3.
OUR POLICIES

Centalion understands its responsibility to ensure that employees are not being exploited, not subjected to poor labour practices, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to. Centalion expects its counterparties to adopt similar standards. To support and demonstrate these commitments, we have developed a set of policies and procedures:

- Our Code of Conduct and Ethics
- Our Code of Conduct and Ethics for Suppliers
- Our Health, Safety, Environment, Human Rights and Communities Policy
- Our SpeakUp! Policy

4.
OUR DUE DILIGENCE PROCESS

– Mapping our activities and monitoring human rights risks:
Centalion conducts human rights risks mapping for its activities, and regularly updates them. We base our analysis on geographical and industry risks. In line with our commitment, we are developing human rights due diligence assessments of our counterparties.

– Screening our counterparties:
To that end, Centalion has set up compliance processes which include human rights and ESG reviews, daily screenings of counterparties to prevent and mitigate risks including those of modern slavery and human trafficking.

– Embedding human rights respect in our contractual relationships:
Centalion also relies on contractual clauses with business partners to ensure human rights are

respected within the partner's activities in connection to its business and uses its influence where violations have been committed by a business partner towards remediation.

– Assessing modern slavery risks prior to new projects:
Sustainability and compliance teams work with M&A. Potential new projects are escalated and reviewed by compliance and sustainability teams. Depending on the level of risk, Centalion requests external expertise to ensure all risks are identified.

Reporting & Transparency

Centalion publishes yearly reports regarding its due diligence processes covering environmental, social and governance topics. This includes processes in place covering modern slavery, forced and child labour. All reports are available on our website: **https://centalion.com/media/news/**

Training

Each year, the entire group's staff is trained on human rights risks in our activities and supply chain, which includes forced and child labour.

Grievance mechanism

The whistleblowing line is accessible to everyone on the company's website. It is possible to submit grievances anonymously and without fear of retaliation.

This commitment will be communicated to staff worldwide as well as to all suppliers, contractors, and **other business partners** (when entering new contracts or renewal of contracts).

This statement applies to the **2026** financial year and will be updated annually.