

Cheniere Marketing International LLP and Cheniere Marketing Ltd
UK Modern Slavery Act Statement

Financial Year Ending 31 December 2019

This statement is made by Cheniere Marketing International LLP (company number OC389850) (“CMI”) and its wholly owned subsidiary Cheniere Marketing Ltd (company number 08821369) (“CML”), in accordance with Section 54 of the UK Modern Slavery Act 2015 (the “Act”) and sets out the steps taken by those entities to ensure that human trafficking and modern slavery practices are not occurring in our business operations or supply chains. This is our second statement, as required by the Act, and provides an overview of our ongoing progress in this area.

1. Our Organisation and Supply Chain

CMI is a limited liability partnership, organised under the laws of the United Kingdom, and is an indirectly wholly-owned subsidiary of Cheniere Energy, Inc. (“Cheniere”). Cheniere is a US-based energy company primarily engaged in liquefied natural gas (“LNG”)-related businesses. CMI engages in the international marketing of the LNG that is produced at Cheniere’s LNG terminals that is in excess of LNG sold under long-term sales contracts. CMI markets, sells and ships that LNG to third party customers for the purpose of providing LNG to international markets under flexible delivery and pricing terms.

CMI also engages in both buy-side and sell-side LNG commercial transactions which are executed on a short, mid or long-term basis, delivered on a “free on board”, “cost and freight” or “delivered at terminal” basis, and indexed to various pricing hubs, depending on customer needs. In addition to the commercial and marketing activities described herein, CMI also seeks to optimise its portfolio predominantly with third party purchases, targeted commodities trading, and shipping charters. In doing so, CMI negotiates a variety of enabling agreements, allowing it to purchase and sell LNG volumes in order to expand CMI’s capabilities as an LNG supplier. CMI’s operations are supported by a supply chain that includes US-based natural gas producers, physical LNG commodities procured directly from Cheniere, and a variety of commodity, shipping, and service suppliers from around the globe.

CMI is also the immediate parent and 100% owner of CML, an employing entity within the Cheniere corporate group limited by shares and incorporated and domiciled in the United Kingdom. CML acts as a service company to CMI and is responsible for providing the front, middle, and back office support necessary for CMI to manage its business operations.

We acknowledge that we must continue to remain vigilant with regard to confronting direct and indirect supply chain-related ethical considerations, including modern slavery, that may arise as we continue to expand the scope of our business activities.

2. Policies addressing Modern Slavery and Human Trafficking Risks

We strive to conduct our operations in accordance with all laws and regulations applicable to the scope of our business activities. We are committed to the fundamental principle of fairness and are dedicated to operating in a manner that aligns with the highest ethical standards. Our values are consistent with the principles and laws set out in the Act and we remain committed to examining, and when necessary,

enhancing our processes and controls to mitigate risks associated with modern slavery and human trafficking. Both CMI and CML adhere to Cheniere's ethical and compliance-related policies. In particular:

- CMI and CML officers and employees adhere to the Cheniere Code of Business Conduct and Ethics which reinforces our commitment to adhering to ethical standards and which promotes a culture of integrity in association with our business activities.
- We have established internal procedures, including a hotline, to facilitate the reporting of potential ethical violations and to protect workers who lodge complaints or report violations.
- Cheniere keeps its policy framework under regular review and seeks to make changes, and/or introduce new policies, where it considers it appropriate to drive further improved performance throughout Cheniere's operations.

3. Due Diligence in relation to Modern Slavery and Forced Labour in our Supply Chain

We engage in robust processes and procedures which allow us to identify, examine, and mitigate the risks associated with modern slavery and human trafficking, including the following:

- We diligently strive to ensure that we work with suppliers who meet our standards of ethical business conduct.
- We diligently strive to ensure that our suppliers comply with laws and regulations applicable to the scope of our business activities.
- As part of our procurement process, we engage in comprehensive due diligence processes and procedures and undertake a prequalification risk assessment where we review extensive background data associated with our transactional counterparties.
- We engage in a risk-based analysis which considers a variety of critical factors, including, but not limited to, supplier jurisdiction, operating history, corporate structure, adverse or potentially adverse information related to a supplier's business practices, geopolitical trade and regulatory requirements, product and service risk, financial records, and scope of work.
- We strive to negotiate express terms and conditions in our supply chain contracts which compel our suppliers and counterparts to comply with applicable laws and ethical standards including compliance with our Supplier Code of Conduct that requires the highest levels of conduct and ethics.
- We work on an ongoing basis to identify any segments of our supply chain with potential risks of unethical activities (including modern slavery and human trafficking-related activities).
- We maintain internal accountability procedures for employees, contractors, vendors, and suppliers regarding compliance with our values and respect for applicable ethical obligations, regulations, standards, and legal requirements.

4. Steps taken to identify, assess, manage and mitigate Risks of Modern Slavery and Forced Labour

In 2019, we continued to manage our business activities and assess our risk profile in accordance with the aforementioned processes, procedures, and risk management initiatives.

Through our assessment activities, we closely examined segments of our business operations which may be susceptible to increased risks of modern slavery and human trafficking. In particular, we closely analysed risks arising from the shipping industry, as we recognise that the shipping industry has been identified as susceptible to challenges in relation to health, safety, ethical, human rights, collective bargaining, and labour law-related concerns.

While we recognise the risks arising from the shipping industry, we have identified and implemented a variety of factors within our business practices which we believe serve to mitigate such risks within our own operations. These factors include the following:

- We strive to ensure that our marine operations (including the activities of our contracted counterparts) comply with the Maritime Labour Convention, which establishes minimum standards for seafarer's rights and working conditions, including, but not limited to, wages, repatriation, employment contracts, and accommodations.
- We maintain and utilise a variety of quality assurance-related protocols and procedures which are leveraged to assess, monitor, and enforce stringent compliance standards expressly required for our commercial counterparts to do business with us.
- We have developed an active, comprehensive, and stringent marine assurance program which periodically and frequently monitors, assesses, and documents whether our shipping counterparts are operating in accordance with recognised standards and industry best practices (including modern slavery-related considerations).
- We strive to ensure that our shipping agreements expressly require our shipping counterparts to materially comply with key international labour law requirements and standards applicable to seafarer's rights (including the standards of the International Transport Worker's Federation).
- We engage in comprehensive due diligence processes and procedures where we review extensive background information associated with our shipping counterparties (including the past and current ethics and compliance practices of such counterparties).

5. Training and Capacity Building

We provide targeted, comprehensive, and ongoing training to our workforce with respect to a variety of ethics and compliance issues, including issues relating to modern slavery. In particular, in March 2019, training on the United Nations Guiding Principles on Business and Human Rights, Modern Slavery and the UK Modern Slavery Act was delivered to targeted departments in our UK office and at Cheniere's corporate headquarters.

In addition, we continued to engage and train key stakeholders and subject matter experts in a variety of areas throughout our business (including representatives from our Legal, Compliance, Supply Chain, Commercial, Human Resources, and Shipping units) with regard to applicable modern slavery ethical requirements inherent in their roles and business activities.

6. Next steps: Looking Forward – Ongoing Commitment

Our efforts to combat risks relating to modern slavery and human trafficking are ongoing and will continue to evolve as we expand our operations. In 2020, we will continue to monitor and assess our enterprise-wide activities in order to identify additional opportunities to enhance our risk mitigation

initiatives relating to modern slavery and human trafficking risks. We will continue to actively engage with our suppliers and commercial counterparts as part of these efforts. In addition, we will seek to examine additional risk management techniques, explore learning opportunities via industry channels, and refine our long-term approach by examining opportunities to develop internal key performance indicators in order to enhance our monitoring and reporting capabilities. Finally, we will continue to expand our training program in order to strengthen the awareness of our workforce with respect to modern slavery and human trafficking-related impacts. We remain committed to continuing to enhance our capacity to assess and mitigate direct and indirect risks relating to modern slavery.

This statement has been reviewed and approved by CMI on June 1, 2020 and its wholly owned subsidiary CML on June 1, 2020, and constitutes our modern slavery and human trafficking statement for the financial year ending December 31, 2019.

For and on behalf of CHENIERE MARKETING INTERNATIONAL LLP
and its subsidiary, CHENIERE MARKETING LTD

By: Eric Bensaude.

Name: Eric Bensaude

BU Title: Managing Director

Date: June 1, 2020