

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

*Financial Year Ending 31 December 2020*

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”). This is our third statement as required by the Act. We remain fully committed to supporting the United Kingdom’s efforts to eradicate human trafficking and modern slavery practices. Accordingly, this statement provides an overview of our ongoing progress to ensure that such practices are not occurring in our business operations or supply chain.

***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 infrastructure company primarily engaged in liquefied natural gas (“LNG”)-related businesses. Cheniere is the leading producer and exporter of LNG in the United States, reliably providing a clean, secure, and affordable solution to the growing global need for natural gas.

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 such 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 are committed to continuing to monitor, assess, and mitigate direct and indirect supply chain-related ethical concerns, including modern slavery risks, that may arise as we 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 ethics 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 confidential 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.

CMI and CML also comply with Cheniere's transparency commitments with respect to corporate responsibility-related disclosures and reporting. Cheniere published its inaugural [corporate responsibility report](#) in 2020 and plans to update and publish future corporate responsibility reports on an annual basis. Such disclosures provide insight and metrics regarding our environmental, social, and governance (ESG) programs.

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

Cheniere strives to ensure that its suppliers comply with laws and regulations applicable to the scope of its business activities. We do not use forced labour, prison labour, indentured labour or exploited bonded labour in our operations and we do not permit our suppliers to do so. In addition, we strive to ensure that our suppliers promote our values with respect to mitigating risks relating to the use of child labour. Furthermore, we engage in robust processes and procedures which enable us to identify, examine, and mitigate the risks associated with modern slavery and human trafficking, including the following:

- As part of our supply chain management process, we require suppliers to engage in a prequalification process that establishes our expectations for compliance with applicable labour, health, safety, and environmental laws and standards, including universal human rights-related standards.
- In connection with our supply chain management process, suppliers are required to review, understand and agree to abide by our Supplier Code of Conduct, which addresses a variety of ethics, compliance, health and safety, and regulatory considerations.
- With respect to our commercial activities, 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 contracts which compel our commercial counterparts to comply with applicable laws and ethical standards, including, as far as we are able, standards relating to human rights and modern slavery.
- We maintain internal accountability procedures for employees, contractors, agents, 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 Human Trafficking***

In 2020, 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 supply chain, commercial, and business operations which may be susceptible to increased risks of modern slavery and human trafficking. While we do not own or directly operate any LNG Carriers (LNGCs) we have continued to analyse 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 developed, implemented, and maintained a variety of practices which we believe serve to mitigate such risks within our own operations and supply chain. These practices include the following:

- 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 through which we review extensive background information associated with our shipping counterparties (including the past and current ethics and compliance practices of such counterparties).
- We have implemented a stringent marine assurance program, which aligns and exceeds the requirements of industry programs to identify, assess, and monitor whether our shipping counterparts are continuing to operate in accordance with recognized standards and best practices including environmental, safety, and operational performance.
- The marine assurance program also ensures that LNGCs chartered or calling at our facilities from a customer are routinely assessed for compliance with the IMO Maritime Labour Convention, which establishes international minimum standards for seafarer's rights and working conditions, including, but not limited to, wages, repatriation, employment contracts, and accommodations.

In light of the COVID-19 pandemic, we recognise that there may be increased workforce and supply chain-related risks relating to modern slavery issues. In 2020, as part of our immediate response to the pandemic, we modified certain business and workforce practices to protect the health, safety, and wellbeing of personnel and suppliers at our facilities. In 2021, we will continue to engage in efforts to

monitor, assess, and mitigate modern slavery risks in our operations and supply chain relating to the COVID-19 pandemic.

### ***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 2019, targeted training on the United Nations Guiding Principles on Business and Human Rights, Modern Slavery and the UK Modern Slavery Act was delivered to key departments in our UK office and at Cheniere's corporate headquarters.

In addition, we have 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, Government Affairs, Human Resources, and Shipping units) with regard to applicable modern slavery considerations inherent in their roles and day-to-day functions. In doing so, we strive to leverage a variety of training methods, including web-based and in-person training sessions.

In 2021, we will aim to further examine our company profile in order to identify functions within our operations that we can further engage regarding these considerations. Additional engagement and training opportunities will be considered as appropriate as we continue to enhance our monitoring and assessment of modern slavery risks applicable to our 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 2021, we will continue to monitor and assess our enterprise-wide activities in order to identify additional opportunities to enhance our risk mitigation activities 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 benchmarking exercises, and refine our long-term approach by examining opportunities to develop internal key performance indicators in order to enhance our tracking, monitoring and reporting capabilities.

Furthermore, we are continuing to strengthen our community engagement efforts through increased interaction with local stakeholders in the communities that we operate in. In doing so, we have provided modest financial support to initiatives that assist victims of human trafficking in the United States. We will continue to explore additional opportunities to further support efforts to mitigate the impacts of modern slavery in the local communities where we operate.

Finally, we will continue to explore opportunities to enhance 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 track, assess and mitigate direct and indirect risks relating to modern slavery.

This statement has been reviewed and approved by authorised representatives of CMI on June 28, 2021 and the Directors of its wholly owned subsidiary CML on June 28, 2021, and constitutes our UK Modern Slavery Act Statement for each of those entities for the financial year ending 31 December 2020.

CHENIERE MARKETING INTERNATIONAL LLP



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By: Eric Bensaude

Position: Managing Director

CHENIERE MARKETING LTD



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By: Corey Grindal

Position: Director