

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

Financial Year Ending 31 December 2018

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out the steps taken by Cheniere Marketing International LLP (“CMI”), and its wholly owned subsidiary, Cheniere Marketing Ltd (“CML”), to ensure that human trafficking and modern slavery are not occurring in our business or supply chains.

Our Values

We strive to conduct our business in accordance with applicable domestic and international laws and regulations. We are committed to the fundamental principle of fairness and dedicated to operating in a manner that aligns with the highest ethical standards. Our values are consistent with the principles of and laws set out in the UK Modern Slavery Act 2015 and we are committed to examining, and when necessary, enhancing our processes and controls to mitigate all risks associated with modern slavery and human trafficking.

Our Organization 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”), a US-based energy company primarily engaged in liquefied natural gas (“LNG”)-related businesses. CMI engages in the international marketing of the LNG produced at Cheniere’s LNG terminals in excess of LNG sold under long-term sales contracts to third party customers. 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 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 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.

Our operations are supported by a diverse supply chain which includes US-based natural gas producers, physical LNG commodities procured directly from Cheniere, and a variety of commodity, shipping, and service suppliers around the globe. We acknowledge the ongoing challenges associated with identifying and managing certain industry-specific risks that may underlie our supply chain. Moreover, we recognise that we must remain vigilant with regard to confronting direct and indirect supply chain-related ethical considerations that may arise (including risks of modern slavery) as we continue to expand the geographical scope of our business activities.

Our Policies

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.

Our Efforts to Identify, Assess and Mitigate Ethical Risks 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:

- As part of our procurement process, we engage in comprehensive due diligence processes and procedures 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.
- We are working to identify any segments of our supply chain with potential risks of unethical activities (including modern slavery and human trafficking-related activities). As a result, and in-line with our risk-based approach, these areas if identified, will receive higher focus in terms of our ongoing due diligence and procurement process reviews.

Tracking the Effectiveness of our Efforts

- 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.

Training

- We have conducted training for key stakeholders and subject matter experts with regard to applicable modern slavery and human trafficking ethical requirements inherent in their roles and business activities.

Next Steps

We recognise the ongoing role we play with regard to combating the risk of modern slavery and human trafficking within our supply chains. CMI and CML will continue to monitor and assess our efforts to mitigate modern slavery and human trafficking risks. Where necessary, CMI and CML will enhance internal resources, systems, and procedures to maximize the effectiveness of our compliance activities. Further, CMI and CML will train its stakeholders on an ongoing basis and will continuously evaluate our strategic initiatives to ensure that our risk mitigation profile remains consistent with industry standards.

This statement has been reviewed and approved by CMI, and its wholly owned subsidiary CML, and constitutes our modern slavery and human trafficking statement for the financial year ending December 31, 2018.

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

By *Eric Bensaude*

Name: ERIC BENSAUDE

Title: Managing Director

Date: 29.3.2019

~~OCI~~