



# Slavery and Human Trafficking Statement

May 2025



# Slavery and Human Trafficking Statement

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024. The companies to which the statement applies are Compañía Española de Petróleos, S.A. and its Subsidiaries Cepsa Comercial Petróleo, S.A., Cepsa U.K, LTD., Cepsa Trading, S.A.U. y Cepsa Química, S.A.

## Moeve

We are a global company comprising over 11,000 employees, committed to sustainable energy and mobility, with the ambition to drive Europe's energy transition and accelerate decarbonisation both within the company and for our customers. We are present in 19 countries, providing energy solutions tailored to each reality.

- › **Energy Parks:** we convert crude oil and other renewable raw materials into products and feedstocks for other industries. We apply innovation and sustainability to develop new renewable products (such as biofuels and, soon, green hydrogen), enabling the decarbonisation of our production processes and supporting other sectors in their transition to lower carbon emissions.
- › **Commercial & Clean Energies:** we are preparing to support our clients in their decarbonization efforts by developing large-scale energy solutions based on green molecules such as green hydrogen and its derivatives, as well as second-generation biofuels. We distribute fuels and biofuels in sectors such as aviation, land transportation, and maritime transportation, in addition to other products like lubricants, asphalts, and diesel fuels.
- › **Mobility & New Commerce:** we support our private and professional customers' mobility needs by providing tailored energy solutions through a multi-energy and ultraconvenience offering, delivered via a comprehensive distribution network. We are driving the decarbonisation of road transport by developing an ultra-fast electric vehicle charging network and marketing renewable diesel HV100.
- › **Trading:** we supply raw materials and intermediate products to our energy parks and other company businesses. We market products in international markets and provide marine fuel solutions. We contribute to the optimisation of energy contracts and assets, leveraging our expert knowledge of the markets. We manage the maritime fleet dedicated to our operations, ensuring quality standards through the vetting department.
- › **Chemicals:** we manufacture and market chemical products, including sustainable options made from plantbased raw materials and renewable energy sources. These products are used in the production of biodegradable detergents, paints, synthetic fibres, polycarbonates, and specialty chemicals, thereby helping our customers reduce their carbon footprint.
- › **Exploration & Production:** we explore, locate, and extract oil and natural gas.

The ownership of the group's shares is primarily held by two shareholders: Cepsa Holding, LLC, which owns 61.36% and is controlled by Mubadala Investment



Company, PJSC, and Matador Bidco, S.À R.L., which owns 38.41% and is controlled by The Carlyle Group, INC.

### Our supply chain<sup>1</sup>

Our supply chain consists of 3,471 suppliers, of which 1,876 are covered by our management model. The remainder forms the so-called "tail spend," representing less than 0.6% of procurement.

77% of our contracted amount, excluding the acquisition of raw materials, was allocated to services, while the rest was directed towards goods such as materials, spare parts, or equipment.

We encourage sourcing from local suppliers because of its positive impact on the surrounding business landscape and the competitive advantages it offers, such as greater flexibility, faster supply, better risk control in the country, and more efficient response times.

We have carried out identification and evaluation processes to determine which contracts can be managed locally, defining areas of action with proximity suppliers.

In 2024, approximately 86% of procurement in our locations with significant operations was conducted with national suppliers, and 37.8% of the total contracted amount was managed by locally established actors. Of our suppliers, 48.2% are Spanish, accounting for 81% of the total expenditure. Additionally, around 43.6% of procurement was carried out in areas near our activities. Contracts with non-national suppliers are established only when highly specialised goods, equipment, or services dependent on multinational technology are required.

### Code of Ethics and Conduct

Following best practices and the values of our shareholders, we operate within a framework defined by the [Code of Ethics and Conduct](#) and the compliance policies approved by the Board of Directors.

These commitments are reflected in clauses included in employee contracts. Subsidiary endorsement of the Code is formally documented before their respective governing bodies.

This commitment extends to partners and counterparties through a request for adherence to both the [Code of Ethics and Conduct](#) and the [Supplier Code of Ethics and Conduct](#). If adherence is not possible, we ensure they share the same

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1. Procurement figures exclude the acquisition of crude oil, raw materials, energy products, and maritime transport related to these products, as well as primary logistics (Exolum), financial products and services, the group's internal operations, donations, and the payment of taxes and duties. Similarly, the information pertains to the amounts contracted within the scope of Procurement, not the amounts invoiced.



principles. For other third parties, commercial contracts include clauses regarding their compliance.

We maintain a zero-tolerance policy for any violations and encourage reporting, ensuring confidentiality and protection from retaliation.

The [Code of Ethics and Conduct](#) also establishes the commitment to apply due diligence with third parties before any commercial operation, adhering to the principles of precaution and respect for human rights.

We have internal control and compliance systems that provide mechanisms for the prevention and management of compliance risks. These systems are audited and certified annually by the Assurance Directorate and, in some cases, by independent experts.

### **Integrity channel**

In compliance with Law 2/2023 on Whistleblower Protection, we have an [Integrity Channel](#) that allows employees and third parties to report irregular behaviour or actions contrary to the [Code of Ethics and Conduct](#), applicable laws, and our internal regulations. The system is confidential, accepts anonymous submissions, guarantees no retaliation for good-faith whistleblowers, and is available 24/7 in Spanish, English, French, Portuguese, and Chinese, both online and by phone.

Investigations are carried out by specialised units depending on the nature of the reported incidents, ensuring independence, objectivity, and absence of conflicts of interest. The Response Committee, a multidisciplinary and independent body, determines any necessary disciplinary or corrective measures.

The Integrity Channel is promoted via the corporate website, intranet, and contractual documents. Additionally, we conduct specific training for employees and internal communication campaigns, such as 'Compliance Talks' and workshops in 'Businesses and Horizontal Functions', to raise awareness about its use.

### **Specific commitments and due diligence processes for slavery and human trafficking**

In addition to our [Code of Ethics and Conduct](#), our [Human Rights Policy](#), which is aligned with international standards and practices, articulates our commitment to human rights in all locations where we operate. This framework defines the behaviours we promote as a company and the requirements we apply to third parties in our commercial and operational relationships, as well as their observation through due diligence processes.

We recognise the importance of contributing to sustainable development and adhere to the most demanding international practices, including:



- Universal Declaration of Human Rights (United Nations).
- International Labour Organization (ILO) Declaration of Fundamental Principles and Rights at Work.
- OECD Guidelines for Multinational Enterprises.
- United Nations Global Compact Principles, which we endorsed in 2005.
- United Nations Declaration on the Rights of Indigenous Peoples.
- ILO Convention 169 on Indigenous and Tribal Peoples.
- 2030 Agenda and Sustainable Development Goals (SDGs).
- Voluntary Principles on Security and Human Rights.

In addition, through the [Sustainable Procurement Policy](#), we are committed to effectively ensuring respect for human and labour rights within the supply chain. Our [Supplier Code of Ethics and Conduct](#) reinforces this commitment by conveying ethical values to our suppliers. We evaluate our suppliers performance to prevent non-compliance and identify potential violations, promoting a culture of respect.

We integrate human rights-related risks into our risk matrix and follow a methodology aligned with the United Nations Guiding Principles on Business and Human Rights. This methodology establishes the criteria for identifying and addressing actual or potential adverse impacts on human rights in our operations, in mergers and acquisitions operations, supply chain due diligence, and engagements with other counterparties.

On our key assets our methodology evaluates the impact in five phases: analysis of the local context, engagement with relevant stakeholders, impact assessment, management measures, and monitoring and reporting. Our supply chain assessment measures factors such as the country, product or service, sector, and compliance level regarding human rights. In merger and acquisition operations, as well as those involving significant third parties, our due diligence process evaluates the country, ownership structure, ultimate beneficial owner (UBO), and Board of Directors, using compliance systems, reputational risks, and various international indices.

In 2024, as in previous years, we did not identify any irregularities in our operations or supply chain.

## Supply chain management

We follow a four-step supplier relationship management process.

### 1. Registration and homologation

We ensure that suppliers meet our requirements so that the associated risk level remains acceptable. Only approved suppliers can be considered for awards, guaranteeing that 100% are systematically evaluated.



We have an ESG (Environmental, Social, and Governance) classification system based on a comprehensive questionnaire. We prioritise awarding contracts to the highest-rated suppliers. Suppliers with lower scores are included in the ESG development meeting plan.

Furthermore, specific sustainability requirements are standardised in the General Terms and Conditions of Contracting and in the contractual templates, ensuring that all third parties collaborating with Moeve must accept them. As a result, 100% of our contracts include sustainability clauses, which are periodically reviewed.

## **2. Risk segmentation and risk control**

We conduct a thorough and ongoing analysis of total expenditure to segment our supply chain based on its criticality. Segmentation, risk level, and type allow us to identify critical suppliers.

We conduct continuous analyses of operational, financial, ESG, human rights, health and safety, country, information security, and counterparty risks (Know Your Counterparty or KYC). Additionally, we evaluate risks associated with activities, including those linked to services and commodities.

We use RiskMethods, a real-time risk monitoring tool integrated into our procurement platform, which includes alerts related to sustainability and human rights, as well as geopolitical, financial, and operational risks. Furthermore, we have enhanced supplier risk management by exploring the supply chain beyond Tier 1, leveraging tools that provide real-time risk information across the entire supply chain.

## **3. Performance evaluation**

We evaluate our active suppliers on aspects such as quality, performance, sustainability, health and safety. Additionally, we have incorporated the evaluation of Tier 2 suppliers with access to our facilities. These evaluations are carried out through questionnaires completed by the end users of the supplied goods and services.

## **4. ESG audits and performance enhancement**

We verify that our suppliers meet the established requirements through on-site audits conducted by the independent entity Achilles. These audits ensure compliance with international sustainability and human rights standards, using a new industry-wide protocol that integrates due diligence into the supply chain. Additionally, on-site audits are carried out by Moeve's internal staff.

In collaboration with Achilles, we assist in resolving identified non-conformities. Audited suppliers are required to implement specific action plans to address and demonstrate compliance with 100% of the recommendations.



This process is complemented by development meetings that follow a protocol based on sustainability questionnaires. These meetings produce a report with recommendations and an associated action plan.

## Training

Training sessions on the commitments outlined in the [Code of Ethics and Conduct](#) are mandatory for employees.

We provide our suppliers with a training platform offering specific content on how to procure goods and services responsibly and sustainably, including human rights due diligence.

Employees in the Procurement Unit receive ongoing sustainability training through the Moeve Campus. Additionally, buyers participate in specific training sessions offered on the Supplier Campus, enabling them to stay aligned in management practices and share best practices with suppliers.

This document has been approved by the Board of Directors of Moeve on 22nd May 2025. Signed by Virginia Beltramini, Secretary of the Board.

A handwritten signature in black ink, appearing to read 'Virginia Beltramini'.

