

moeve

Slavery and Human Trafficking Statement

May 2026



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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 2025. The companies to which the statement applies are Moeve S.A. and its subsidiaries: Moeve Commercial S.A.U., Moeve Trading S.A.U., Moeve Chemicals S.A.U., and Moeve Chemical UK Ltd.

Moeve

We are a global company committed to sustainable energy and mobility, with the ambition to drive Europe's energy transition and accelerate decarbonization both within the company and for our customers. We are present in 22 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 prioritize safety and apply innovation and sustainability to develop new renewable products (such as biofuels and, soon, renewable hydrogen), enabling the decarbonization of our production processes and supporting others.
- › **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 renewable 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:** we support our private and professional customers' mobility needs with a multi-energy and ultraconvenience offering, delivered via a comprehensive distribution network. We are driving the decarbonization 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 optimization 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 plant-based raw materials and/or 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 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, and Matador Bidco S.À R.L., which owns 38.41% and is controlled by The Carlyle Group.

Our supply chain¹

We have 4,799 suppliers (2,241 covered by our management model). The remainder (the "tail spend") represents less than 0.8% of contracting. 77% of the contracted value, excluding the purchase of raw materials, was allocated to services, with the remainder going to goods.

We promote the hiring of local suppliers due to their positive impact on the regional business ecosystem and the competitive advantages they offer, such as greater flexibility, faster supply, better country risk control and more efficient response times. We identify contracts that can be managed locally and define areas of action.

In 2025, approximately 90% of contracting in significant locations was with national suppliers and 46.7% of the total value was managed by locally established actors. Of our suppliers, 66.8% are Spanish, accounting for 84.5% of total spend. Additionally, around 52.6% of contracting in Spain took place in areas near one of our operations. International contracts are limited to highly specialized goods or services or those dependent on multinational technology.

Code of Ethics and Conduct

We operate in accordance with a regulatory framework formed by the [Code of Ethics and Conduct](#) and the compliance policies approved by the Board of Directors.

The Code of Ethics and Conduct is integrated across all our activities and commercial relationships: specific clauses in employment contracts, mandatory training and formal subsidiary adherence through agreements with their governing bodies. We invite partners and counterparties to adhere to the Code of Ethics and Conduct and the [Suppliers' Code of Ethics and Conduct](#); where this is not possible, we verify that their ethical principles are equivalent. Commercial contracts incorporate clauses requiring compliance with our commitments. In addition, we apply due diligence with third parties before entering into any commercial transaction, under the principles of integrity, precaution, and respect for human rights.

We are firmly committed to a zero-tolerance approach towards non-compliance and actively encourage the reporting of misconduct through confidential and secure channels, ensuring that no reprisals occur.

The Internal Control and Compliance System, comprising programs that are audited and certified annually by the Assurance Department and, in some cases, by independent experts, provides mechanisms for the prevention and management of compliance risks.

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 refers to the amounts contracted within the scope of Procurement and does not take invoicing into account.

Integrity channel

We have an [Integrity Channel](#) accessible to employees and third parties to report irregularities, in compliance with Law 2/2023 on whistleblower protection. This system is confidential, allows anonymous reporting, ensures protection from reprisals for good-faith informants, and is available 24/7 in Spanish, English, French, Portuguese, and Chinese via web and telephone. The Ethics and Compliance Office manages the channel under the supervision of the Audit, Compliance, Ethics and Risk Committee, with the Assurance Director serving as the responsible officer.

Reports received through the channel are investigated by specialized departments, ensuring independence, confidentiality, impartiality and absence of conflicts of interest. In cases involving members of the Board of Directors, the Management Committee or the Assurance Department, investigations are led by the Independent Director and Chair of the Audit, Compliance, Ethics and Risk Committee. Disciplinary or corrective measures are determined by the Response Committee, a multidisciplinary and independent body.

The Ethics Committee meets quarterly to review reports received through the channel, alongside other indicators, to ensure its proper functioning, encourage its use, and confirm that necessary measures have been implemented.

We promote the channel via our website, intranet, and third-party contracts, complemented by targeted training and internal communication campaigns, such as 'Compliance Talks' and workshops in 'Business and Horizontal Functions'. A biannual report on the channel is published, and an ethics culture survey has demonstrated its ongoing strengthening.

Specific commitments and due diligence processes for slavery and human trafficking

Our [Human Rights Policy](#) reflects our commitment to respecting human rights and defines the behaviors we promote as well as the requirements we extend to third parties. This policy is aligned with key international standards and norms, including: the Universal Declaration of Human Rights of the United Nations; the ILO Declaration on Fundamental Principles and Rights at Work; the OECD Guidelines for Multinational Enterprises; the United Nations Global Compact principles, to which we have been a signatory since 2005; the UN Declaration on the Rights of Indigenous Peoples; ILO Convention 169 on Indigenous and Tribal Peoples; the 2030 Agenda and Sustainable Development Goals (SDGs); and recommendations from the Voluntary Principles on Security and Human Rights.

We complement this commitment with our [Sustainable Procurement Policy](#) and the [Suppliers' Code of Ethics and Conduct](#).

We integrate human rights risks into our risk matrix in line with the UN Guiding Principles on Business and Human Rights to identify adverse impacts and positive contributions. This analysis is conducted across mergers and acquisitions, the supply chain, and our relationships with other counterparties through due diligence processes.

We periodically assess human rights risks associated with our active suppliers and apply due diligence to those presenting medium or higher risk. The assessment² takes into account the country, product or service, sector and ESG score to assign a risk level of human rights. We review their ESG scores on our procurement platform, performance evaluations, counterparty analyses, audits, and other relevant sources.

In mergers and acquisitions or in relationships with significant third parties, our due diligence process evaluates the country, shareholding structure, ultimate beneficial owner (UBO), and Board of Directors through our compliance system, reputational risk assessments, and international indices.

In 2025, as in previous years, we have not identified any human rights irregularities either in our operations or across the supply chain.

Supply chain management

Our relationship with suppliers is managed through four phases, enabling us to ensure alignment with ESG criteria and the [Suppliers' Code of Ethics and Conduct](#).

1. Registration and homologation

We verify that suppliers meet our requirements to ensure that the associated risk level is acceptable. Only approved suppliers may be awarded contracts, ensuring that 100% are systematically assessed.

We have an ESG classification system integrated into our platform, with data automatically transferred to the award files.

We prioritize the highest-rated suppliers, sharing their score and ranking relative to other companies on the MyAchilles platform. Lower-rated suppliers participate in ESG development meetings, where they receive improvement recommendations, technical support, and follow-ups. We integrate sustainability into decision-making through the calculation of Total Value of Ownership (TVO).

Additionally, sustainability requirements are standardized in the [General Contracting Terms](#) and contractual templates, so that all suppliers must confirm they have read, understood, and accepted them. In 2025, we updated the 'General Contracting Terms' ensuring that 100% of our contracts include sustainability clauses, which are reviewed periodically.

2. Segmentation and risk control

We analyze total expenditure to segment our supply chain according to criticality³.

² In our assessments, we consider forced labour, child labour, human trafficking, freedom of association, collective bargaining rights, equal pay, and non-discrimination, covering various groups such as women, children, Indigenous peoples, migrant workers, contractors, and local communities.

³ Segments I, II, and III: represent approximately 9% of our suppliers and 86% of annual spend. We focus on this group to implement our initiatives and strengthen tailored relationship models.

Segments IV and V: although not strategic, we monitor operational and sustainability risks through risk cards. Segment IV suppliers with any high-risk exposure are also considered critical, requiring specific management. We efficiently manage Segment V suppliers, known as the "tail spend" (purchases under 25,000 euros), through automation and digitalization processes.

Critical suppliers comprise Segments I, II, and III, suppliers in Segment IV with any high-risk level, suppliers that are the sole source of supply, as well as Tier 2 suppliers with access to our facilities. We monitor and analyze, through our procurement platform, operational, financial, ESG, human rights, health and safety, country, information security, and counterparty (Know Your Counterparty, KYC) risks, as well as those associated with products and services.

In 2025, 3,126 active suppliers underwent a risk assessment. For another 488 suppliers, an additional compliance analysis was conducted via international list checks, following the KYC procedure. No suppliers with high or very high risks were identified.

3. Performance evaluation

We evaluate quality, execution, sustainability, and health and safety through questionnaires completed by end users of goods and services, including Tier 2 suppliers with access to our facilities.

In 2025, we conducted 1,938 assessments and evaluated 826 suppliers based on their criticality. As a result, 94% of our critical suppliers have at least one performance assessment.

4. ESG audits and performance enhancement

We conduct on-site audits with the independent entity Achilles to ensure compliance with international sustainability standards, using a new industry-wide common protocol that integrates due diligence, as well as with Moeve's internal staff.

In 2025, we carried out 65 on-site audits, covering a total of 172 active suppliers with current audits. These audits include a 24-month period during which, together with Achilles, we help close non-conformities. Audited suppliers must implement action plans to address 100% of the recommendations. We work to close these non-conformities, aiming for 85% of those identified in the past two years to be resolved. By the end of 2025, 85% had been closed.

This is complemented by ESG development meetings, in which a report with recommendations and an associated action plan are generated (11 meetings in 2025), as well as technical support provided during both audits and development meetings.

Training

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

We provide a training campus for suppliers focused on responsible and sustainable procurement. In 2025, we continued to expand the offering with new learning modules and technical support to enhance suppliers' sustainability capabilities and performance. A total of 492 suppliers participated in capacity-building programs, with 31.8% of critical suppliers included in this campus.

Procurement employees receive continuous sustainability training through the Moeve Campus and also participate in training delivered via the Supplier Campus, allowing them to share best practices with suppliers.

This document was approved by the Board of Directors of Moeve, S.A. on May 22, 2026.

A handwritten signature in black ink, appearing to read 'Maarten Wetselaar', is positioned above the printed name.

Maarten Wetselaar
Chief Executive Officer
Moeve, S.A.

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