

The Boards of Phillips 66 Limited and JET Retail UK Limited (each the “Company”) have approved this Modern Slavery Act Transparency Statement in compliance with section 54 of the Modern Slavery Act 2015, which is available to view on the P66 UK website: [www.phillips66.co.uk](http://www.phillips66.co.uk)

## **MODERN SLAVERY ACT 2015 DISCLOSURE**

### Background

The Modern Slavery Act 2015 (the “Act”) requires certain companies carrying on business in the U.K., such as Phillips 66 Limited and JET Retail UK Limited (each the “Company”), to issue an annual statement regarding the steps taken by it during the financial year to prevent slavery and human trafficking taking place in any part of its business or in any of its supply chains.

### The UK Business structure and supply chain

Phillips 66 Limited has over 900 employees in the UK. Phillips 66 Limited refines crude oil into petroleum products, buys and sells commodities, supplies bulk fuels to the commercial, aviation and marine industries and markets fuels under the JET brand through branded distributors, dealers and a small number of company owned retail sites. The Company sources goods from Europe and the rest of the world. Most services are sourced from the UK.

Phillips 66 Limited has several UK subsidiaries, a 50% interest in a few UK joint venture companies, a Swiss subsidiary holding a minority interest in two pipeline JV companies (one Italian and one Austrian) and a Chinese Wholly Foreign Owned Enterprise. During 2024 Phillips 66 Limited also had a 49% equity interest in a Swiss operating joint venture which was sold in January 2025. However, the supply chain activities relating to the UK business of Phillips 66 Limited are conducted through its UK subsidiaries and UK joint venture companies and the majority by Phillips 66 Limited itself.

JET Retail UK Limited is a wholly owned subsidiary of Phillips 66 Limited, which owns retail fuel sites through which it sells automotive fuels and other retail goods. Both Phillips 66 Limited and JET Retail UK Limited are part of the Phillips 66 group of companies and their ultimate parent company is Phillips 66 (listed on the New York Stock Exchange).

The Company focuses its efforts in managing Environmental, Social and Governance (ESG) risk, including Modern Slavery, in the higher-risk business areas in which it operates.

### Phillips 66 Policies

At Phillips 66, safety, honour and commitment are its core values, and ethics play a key role in every aspect of its business. Phillips 66 is committed to a sustainable business foundation. For Phillips 66, sustainability is about the long-term viability of its business and that of its business partners, and the actions Phillips 66 takes to achieve success including respect for people, operating excellence and ethics.

Phillips 66 is committed to complying with the law wherever it operates and to conducting all business activities in accordance with the highest ethical standards. Phillips 66’s ethical standards are reflected in its [Code of Business Ethics and Conduct \(the “Code of Ethics”\)](#) which has recently been refreshed and applies to all wholly owned subsidiaries of Phillips 66 and summarizes the ethical conduct and compliance with all laws expected of their employees. Employees are personally accountable for annually reviewing the Code of Ethics, receive training on it and are required to certify their compliance with its standards or disclose any exceptions and any proven violation is subject to disciplinary action. The Code of Business Ethics and Conduct addresses human rights and forced labour concerns.

Phillips 66 expects the same of the parties with which it does business. Phillips 66’s [Business Partner](#)

Principles of Conduct, which has also recently been refreshed, requires its suppliers and contractors to observe all applicable laws and regulations governing health, safety and the environment, wages, hours, recruiting and employment practices, and to prohibit employment of those below the minimum employment age and the holding of any person in slavery or servitude or the use of forced or indentured labour and human trafficking.

The Company has processes for reporting concerns relating to violations of the law or noncompliance with the Code of Ethics or Business Partner Principles of Conduct, including the use by its suppliers of forced, compulsory or trafficked labour, or anyone held in slavery or servitude. Phillips 66 also maintains a 24/7 ethics hotline and email account where employees, contractors or outside third parties can report any concerns of possible ethics violations, including slavery and human trafficking, anonymously if they feel the need. Every submission is reviewed. The Company also has a UK Whistleblowing Policy with additional local arrangements for reporting any concerns.

#### Due diligence, monitoring and risk assessment

The Company is committed to verifying and monitoring its suppliers through its third-party due diligence process and via data sources such as Moody's. By completing risk assessments, the Company has considered and keeps under review, the risks of slavery and human trafficking in its business and supply chains. One area considered to have an elevated level of risk relative to the other parts of its supply chain is international marine logistics. The Company considers current vetting requirements for vessels to be used by the Company to be adequate to identify any concerns in this area.

An emerging risk is the sourcing of renewable feedstocks from new global counterparties and locations, and again in this area, the Company assesses counterparty risk and conducts due diligence as appropriate. To safeguard the Company's higher risk suppliers and implement the Company's standards, the Company ascertains if counterparties have anti-slavery policies and verify if they have an independent third-party certification, such as ISCC which would mitigate these risks. In the event of a supplier having neither, the Company would ask such supplier to certify that they will comply with contractual obligations regarding modern slavery compliance as well as the Phillips 66 Business Partner Principles of Conduct.

To ensure that its supply chain reflects Phillips 66's values and ethics, the Company's sourcing processes, for services performed at our businesses and for equipment fabricated at Company's request and those of its subsidiaries within its supply chain, include due diligence measures, and the Company's contract terms set out the Company's expectations for its suppliers to adhere to the Business Partner Principles of Conduct and to comply with all laws relating to combating slavery and human trafficking, including the Act and the request to implement due diligence procedures for its own suppliers. The Company requires that its suppliers immediately notify the Company if they become aware of any breach or potential breach of the Act.

The Company uses only reputable employment agencies to source contract labour. The Company seeks to include provisions in contracts with those agencies requiring adherence to the Business Partner Principles of Conduct and compliance with all laws relating to combating slavery and human trafficking, including the Act.

The Company will exercise its contractual rights against any supplier found to be in violation of its obligations in this regard.

The Company continues to keep its supply chain procurement practices under review so further enhancements can be made to reflect best practices in higher risk areas.

No reports of concern in this area were raised during supply chain due diligence, by suppliers or by auditors during the year ended 31 December 2024.

#### Training

The Company takes ethics seriously. All employees receive training on the Code of Ethics and are accountable to review it annually and to certify their compliance with its standards or disclose any exceptions, which are then followed up as required.

The Company's personnel, employees and management with direct responsibility for supply chain management are trained to recognise health and safety best practices and are trained to report and investigate all deviations from expected standards. Those involved in supply chain procurement management activities continue to receive periodic training to increase awareness of modern slavery and ensure understanding of the Company's relevant policies and procedures. Training is also provided to those involved in sourcing of renewable feedstocks to increase awareness and identify any areas of concern.

Approved by the Board of Directors of Phillips 66 Limited as our slavery and human trafficking statement for the year ended 31 December 2024.

Signed by Paul Fursey  
Director  
Phillips 66 Limited

Approved by the Board of Directors of JET Retail UK Limited as our slavery and human trafficking statement for the year ended 31 December 2024.

Signed by Rupert Turner  
Director  
JET Retail UK Limited