



SEFE Marketing & Trading Limited

Slavery and Human Trafficking Statement

SEFE Marketing & Trading Limited (“SM&T”) fully support the aims of the Modern Slavery Act 2015. Our Slavery and Human Trafficking Statement reflects our commitment to acting ethically and with integrity in our business relationships. We endeavour to ensure that slavery and human trafficking is not taking place anywhere in our business or supply chains.

Background

This is SEFE Marketing & Trading Limited’s statement on slavery and human trafficking. This statement is made pursuant to section 54(1) of the Modern Slavery 2015 (“Act”) for the financial year ending on 31 December 2025 and includes SM&T’s subsidiaries (together “SM&T”), as follows:

- SEFE Energy Limited
- SEFE LNG Limited
- SEFE Energy France SAS
- SEFE Marketing & Trading Switzerland AG
- SEFE Marketing & Trading Singapore PTE Ltd
- SEFE Marketing & Trading USA, Inc
- SEFE M&T Mexico S. DE R.L. DE C.V.

SM&T is fully committed to ensuring that it complies with all applicable legal requirements, including without limitation the Act.

Our people and business

SM&T employs over 850 people worldwide and has business operations in the UK, Singapore, Switzerland, France and USA. SM&T is ultimately owned by the German Government represented by the Federal Ministry for Economic Affairs and Climate Action (BMWK) and forms part of the SEFE Group (“**SEFE Group**”) of companies, adopting all SEFE Group policies. We are a leading player in global trading energy markets, combining the physical & financial trading of LNG, gas, power, metals and environmental products with the provision of comprehensive risk management, derivatives, algorithmic trading, and third-party asset management services.

SEFE Group is committed to ensuring fair and respectful working conditions throughout our company. Our Code of Conduct is available in our Website to all staff members and also partners. We deploy training on our Code of Conduct to our staff members timely ensuring awareness. We encourage our staff members

to speak up if they feel that something “is not right”. SEFE provides safe and secure whistleblowing channels where reports can be made confidentially (the whistleblowing channel is available for external parties and to SEFE staff members). All reports are taken seriously and investigated by an independent team.

We're proud to play our role in contributing to our group's mission: to secure energy for Europe and drive the green energy transformation. From selling renewable energy products to offering energy management services, we support our customers throughout their energy transitions. We're also committed to doing our part to support our communities and our people. Along with our Silver EcoVadis accreditation, we hold a gold accreditation from Investors in People.

Our policy on slavery and human trafficking

SM&T fully supports the aims of the Act. Our policy reflects our commitment to acting ethically and with integrity in all our business relationships and to endeavour to ensure that slavery and human trafficking is not taking place in our business or supply chains.

SM&T aims to be an attractive employer, a reliable partner and a good neighbour, which is why we respect human rights, care for our staff members and are dedicated to the local communities where we operate. Respect for human rights is integral to our company culture and forms the basis for our responsible business, every day and in every business operation. We are committed to respecting, safeguarding and ensuring adherence to human rights both at our company and along our value chains.

Our Human Rights Statement

Respect for human rights is integral to our company culture and forms the basis for our responsible business, every day and in every business operation. We are committed to respecting, safeguarding and ensuring adherence to human rights both at our company and along our value chains.

We expressly endorse, respect and support internationally recognised human rights across our business activities in accordance with:

- The Universal Declaration of Human Rights,¹ adopted by the UN General Assembly in Paris, December 1948.
- The ILO Declaration on Fundamental Principles and Rights at Work,² adopted in 1998 and amended in 2022.

We acknowledge and align our business activities with international standards, including:

- The United Nations Guiding Principles on Business and Human Rights.
- The Ten Principles of the United Nations Global Compact.
- The OECD Guidelines for Multinational Enterprises.
- The UK Modern Slavery Act.
- The German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

Our Supply Chain

The SEFE Supplier Code of Conduct strengthens our commitment to responsible, ethical, and sustainable business practices across the entire energy value chain, our suppliers play a vital role. The SEFE Supplier Code of Conduct sets out the principles and expectations we require from our external partners. It reflects our shared responsibility to uphold human rights, protect the environment, ensure safe and fair working conditions, and conduct business with high standards of integrity.

We are committed to identifying and avoiding risks related to human rights, the environment, and compliance along our supply chain at an early stage. We implement risk-adequate supply chain management to detect potential risks early and take preventive or remedial action. A key element is our complaint mechanism, which includes anonymous reporting via our whistleblowing system.

To ensure compliance with our commitments, we will implement an ongoing due diligence process to identify, address, evaluate and communicate the risks of adverse human rights impacts in our operations and supply chains. It is our intention to update our due diligence processes continuously and adapt them to changed circumstances. This process involves:

- identifying human rights risks, including weighting and prioritising these risks, through regular risk analysis as well as on an ad hoc basis, if needed;
- addressing these risks through effective preventive measures and appropriate remedial measures in case of violations;
- embedding these measures in all relevant business processes;
- regularly monitoring the effectiveness of our preventive and remedial measures as well as of our grievance mechanisms.

Our Governance

At SEFE, senior management set the clear expectation that all staff have a responsibility to uphold our commitments to respect human rights. This task will be embedded in our business processes and activities, including our Know-YourCustomer (KYC) reviews of new counterparties.

SEFE takes its commitment and obligations seriously to promote and protect human rights in our own operations and supply chains. Additionally, our Code of Ethics and Business Conduct, HR policies and other internal company policies complement and reinforce this Statement.

The SEFE Supervisory Board, assisted by the ESG Committee and other committees, is equally committed to ensuring adherence to our human rights commitments and monitoring implementation of policies and practices related to human rights within SEFE. SEFE Management Council and the senior management team are responsible for the implementation of human rights due diligence processes as well as for ensuring that all related risks are properly addressed and that any breaches are investigated and remediated. SEFE Risk Management committees ensure that human rights risks are considered in SEFE's global risk management processes.

A new statement will be published each year on the corporate website <http://www.sefe-mt.com>

This statement has been approved by the Board of SEFE Marketing & Trading Limited and SEFE Energy Limited in May 2026.
