



1 Canada Square  
Canary Wharf  
London  
E14 5AA  
Tel +44 (0)20 7513 3000

## United Kingdom Modern Slavery Act 2015 - Supply Chain Transparency Statement

***This statement is made by Valero Holdco UK Ltd for itself and on behalf of its UK trading affiliates (collectively, the "Companies"), pursuant to section 54 of the Modern Slavery Act 2015 (the Act) for the financial year ending 31 December 2019.***

Any references to 'we' 'us' 'our' or 'ours' shall be interpreted as references to the Companies, as the context so requires.

### UPDATED STATEMENT ON COVID-19 AND MODERN SLAVERY

We are continuing to have regard to the risks posed by the Covid-19 pandemic and to how those risks may affect combatting modern slavery in our business.

As a response to the COVID-19 pandemic, we have targeted attention on promoting compliance in our shipping supply chain and reminded key counterparties of the obligations of the Maritime Labour Convention 2006.

In general, we have not yet seen any material impact on our ability to assess the risk of modern slavery, or our capacity to meet our objectives in relation to the Modern Slavery Act 2015 due to the pandemic. However we will keep our objectives under review. In the event that the Covid-19 pandemic does materially affect our ability to review the risk of modern slavery in our business or to take action against it, we may re-adjust our assessment methods and/or our objectives.

### SUMMARY OF ACTION SINCE 2019

In accordance with the objectives set in our 2019 modern slavery statement, we have:

- Assessed the potential risks in our supply chains by analysing the risk in our supply chains by country, sector and business partnership to identify low, medium or high risks.
- Ensured our suppliers understand their duty to comply with all applicable laws (including the Act, by implication) in the performance of Services and the Supply of Goods and confirming that non-compliance with these standards may be grounds for termination.
- Taken steps to promote compliance especially in our shipping supply chains.
- Held industry-wide discussions with peer companies to consider further effective ways of ensuring compliance with the Act, especially high risk areas such as shipping.
- maintained our employee e-learning training about modern slavery.

Registered Office:  
1 Canada Square  
Canary Wharf  
London E14 5AA



1 Canada Square  
Canary Wharf  
London  
E14 5AA  
Tel +44 (0)20 7513 3000

## **ORGANISATION'S STRUCTURE AND SUPPLY CHAIN**

Valero Energy Corporation is the ultimate parent company of the Companies and is headquartered in San Antonio, Texas, United States. The Group owns and operates 15 refineries throughout the United States, Canada, and the United Kingdom. The Group's global turnover is approximately \$108.324 billion USD; it operates in several countries and employs approximately 10,000 people worldwide. More information about the Group is available at [www.valero.com](http://www.valero.com)

We are a manufacturer and supplier of transportation fuels and other petrochemical products. Our business operates the Pembroke Refinery in Pembrokeshire importing crude oil, refining it into a number of finished products for distribution in a wide range of sectors. As well as the operational team, there is also a significant support and administrative function.

Our operations are supported by a global supply chain for goods and services. This supply chain includes suppliers of raw, direct and indirect materials, and skilled labour and other services required for our operations.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

Our Corporate Anti-slavery and Human Trafficking Policy and our Code of Business Conduct of Ethics reflect our commitment to act ethically and with integrity in all our business relationships and to implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. They are available on our intranet and are accessible by and applicable to all Group employees, officers and directors.

A confidential reporting hotline is available to Group employees 24 hours a day, 7 days a week. Employees are directed to immediately report any information from any source that alleges a violation of our policies on slavery and human trafficking. We also operate a Whistleblowing Policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

As part of our initiative to identify and mitigate risk, we have continued our work in the following areas:

- Assessing the potential risks in our supply chains by analysing the risk in our supply chains by country, sector and business partnership to identify low, medium or high risks. As a response to the COVID-19 pandemic, we have sought to ensure compliance in our shipping supply chain and have reminded key counterparties of the obligations of the Maritime Labour Convention 2006. We will continue to monitor and update our risk assessment in the year ahead to take into account changing circumstances; and
- Continuing to ensure our suppliers comply with all applicable laws (including the Act, by implication) in the performance of Services and the Supply of Goods and confirming that non-compliance with these standards may be grounds for termination.

Registered Office:  
1 Canada Square  
Canary Wharf  
London E14 5AA



1 Canada Square  
Canary Wharf  
London  
E14 5AA  
Tel +44 (0)20 7513 3000

## **SUPPLIER ADHERENCE TO OUR VALUES**

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values..

## **INDUSTRY LEARNING**

We continue to raise awareness of the Act internally and have also taken part in industry wide discussions with peer companies to consider further effective ways of ensuring compliance with the Act, especially in high risk areas such as shipping. Our employees have developed from an e-learning program which we have rolled out across the business. To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we aim to continue to provide training to relevant members of staff.

## **ONGOING MONITORING**

We will continue to develop and monitor our compliance with our Corporate Anti-slavery and Human Trafficking Policy and the Act.

## **FURTHER STEPS**

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps during the coming financial years to combat slavery and human trafficking:

- We will continue to risk assess our supply chain and undertake due diligence on our suppliers in relation to compliance with the Act.
- to continue to engage in dialogue around modern slavery issues in the oil industry through our participation in oil and gas industry associations (e.g. UKPIA) and to explore and promote potential solutions that are raised.

This statement is made pursuant to section 54(1) of the Act and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2019.

**VALERO HOLDCO UK LTD (Approved by the board on 12/12/2020)**

A handwritten signature in blue ink, appearing to read 'Matt Dooley', is written over a light blue circular stamp.

Matt Dooley, Vice President  
On behalf of the Companies

Date: 22/12/2020

Registered Office:  
1 Canada Square  
Canary Wharf  
London E14 5AA