

The Boards of Phillips 66 Limited and Phillips 66 CS 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

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 Phillips 66 CS 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

Phillips 66 Limited has over 1050 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. Phillips 66 Limited has a number of UK, German and Austrian subsidiaries, a subsidiary in Switzerland and in the Cayman Islands and a Chinese Wholly Foreign Owned Entity. However the supply chain activities relating to its UK business are conducted through its UK subsidiaries, the majority of which by Phillips 66 Limited itself.

Phillips CS Limited is an indirect wholly-owned subsidiary of Phillips 66 Limited, and is engaged in the purchasing, storage, blending, distribution and selling of hydrocarbon products.

Both Phillips 66 Limited and Phillips 66 CS 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).

Phillips 66 Values and Ethics

At Phillips 66, safety, honour and commitment are its 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 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](#) 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.

Supply Chain Practices and Recruitment

The Company has considered and keeps under review, the risks of slavery and human trafficking in its business and supply chains. Currently only one area is considered as having an elevated level of risk relative to the other parts of its supply chain (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.

The Company sources goods from Europe and the rest of the world. Most services are sourced from Europe.

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 (such as pre-qualification compliance questionnaires), 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 verifies its supply chain for onsite services and the provision of materials and equipment by periodic audits performed by the Company and, in some cases, third-party auditors contracted by the Company conduct on-site inspections. Phillips 66 personnel performing these audits are trained to recognize and are obligated to report non-compliance.

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 practice 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 2020.

Training and Reporting of Concerns

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.

The Company has processes for reporting concerns relating to violations of the law or non-compliance 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.

Approved by the Board of Directors of Phillips 66 Limited as our slavery and human trafficking statement for the year ended 31 December 2020.

Signed by Darren J. Cunningham
Director

Approved by the Board of Directors of Phillips CS 66 Limited as our slavery and human trafficking statement for the year ended 31 December 2020.

Signed by Mark E. McCulloch
Director