

CHINA AVIATION FUEL (EUROPE) LIMITED

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This Modern Slavery and Human Trafficking Statement sets out the steps that China Aviation Fuel (Europe) Limited (the “**Company**”, “**we**”, “**us**” or “**our**”) had taken in relation to our responsibilities to mitigate the risk of slavery, servitude and forced or compulsory labour and human trafficking (hereinafter collectively referred to as “**modern slavery and human trafficking**”) within our business operations and supply chains in the financial year ended 31 December 2024.

We are committed to respecting human rights and addressing potential risks of modern slavery and human trafficking in all its forms across our business operations, supply chains, and products. We have zero-tolerance towards modern slavery and human trafficking and expect the same high standards from all our suppliers in the supply chains.

Organisational Structure, Business and Supply Chains

The Company is a wholly owned subsidiary of China Aviation Oil (Singapore) Corporation Ltd, and has business operations in airport hubs across the European region including the United Kingdom, Germany, Netherlands.

We are a European wholesale aviation fuel trader and supplier, with access to globalised supply chains involving international shipping, refined product pipelines, and storage terminals, for petroleum-based aviation fuel as well as sustainable aviation fuel (SAF) (the “**Product**”).

We work with a number of key direct suppliers, primarily aviation fuel and/or SAF suppliers, with the Product subsequently supplied by us in airport hubs for our airline customers.

Policies

The Company maintains a strong ethical framework supported by key policies that reinforce our zero-tolerance approach to modern slavery and human trafficking.

- Employee Code of Conduct

Sets clear standards of lawful and ethical behaviour. Employees are expected to act with integrity and report any potential misconduct or exploitation within our business operations or supply chains.

- Whistleblowing Policy

Provides safe and confidential channels for employees and third parties to report concerns, including potential risks of modern slavery, without fear of reprisals.

- Counterparty Management Policy

Ensures that all counterparties are subject to “Counterparty Due Diligence” checks prior to engagement, assessing their integrity, compliance record, and adherence to ethical business standards.

- Anti-Money Laundering & Counter Terrorist Financing Policy

Requires all group entities to establish business relationships only with reputable, law-abiding clients and partners. “Know Your Customer” and “Counterparty Due Diligence” checks help prevent illicit

activities that could be linked to modern slavery and human trafficking by identifying high-risk business partners and integrating responsible business conduct into supply chain management.

- Sustainable Supplier Code of Conduct

The Group's Sustainable Supplier Code of Conduct establishes a framework that we consider important to managing our supply chain and sets out essential guidelines for our suppliers. The said Code underscores the Group's stance in relation to modern slavery and human trafficking, and other applicable laws.

Due Diligence

We adopt comprehensive due diligence processes to identify the risks associated with each counterparty. As part of counterparty on-boarding, each of the counterparties are required to declare their compliance with various ESG aspects and applicable laws. This would include but not limited to availability of policies, procedures or codes of conduct relating to safety of personnel working at their workplaces.

Training

To safeguard the integrity of our business, the Group maintains a comprehensive ethics and compliance training programme to ensure employees understand and adhere to all relevant laws and internal policies and procedures. All employees are required to complete mandatory web-based training courses designed to strengthen awareness of regulatory obligations and ethical conduct.

Monitoring and Evaluation

We review our controls and counterparty management processes at least once a year to ensure effectiveness. Any reported concerns are investigated promptly, and corrective actions are taken where appropriate.

Xiwu Tang

Executive Director

China Aviation Fuel (Europe) Limited

15 October 2025