

Modern Slavery Transparency Statement

UK Modern Slavery Act 2015



Introduction

In accordance with our obligations under the UK Modern Slavery Act 2015, this statement sets out the steps taken by Irving Oil Whitegate Refinery Limited and John Kelly Fuels (Ireland) Unlimited Company (together “**Irving Oil**”) to reduce the risk that slavery, forced or compulsory labour and human trafficking is taking place in any part of our business or supply chains. Irving Oil is committed to preventing slavery, forced or compulsory labour and human trafficking in its corporate activities, and to ensuring that its business and supply chains are free from slavery, forced or compulsory labour and human trafficking.

Our Business

Irving Oil is part of the larger group of international gasoline refining and marketing companies headquartered in Canada (the “**Irving Oil Group**”). The Irving Oil Group operates refineries in Saint John, New Brunswick, Canada and in Whitegate, County Cork, Ireland and has a portfolio of over 900 Irving Oil retail locations across eastern Canada and the North Eastern United States and over 200 Top Oil retail locations across Ireland. The Irving Oil Group also blends and stores gasoline products in various terminals, including one located in the Netherlands and supplies fuel in Northern Ireland.

Our Supply Chains

The Irving Oil Group’s commercial activity is largely carried out in Canada, the United States, Ireland and the Netherlands. Management of our gasoline blending and trading business in the Netherlands, sales of products from our Whitegate refinery and supply of products to our Whitegate refinery and our TOP Oil terminal in Ireland were in the period covered by this statement carried out by a team of employees of Irving Oil Whitegate Refinery Limited who are based in London. An Irish subsidiary, John Kelly Fuels (Ireland) Unlimited Company, operates a fuel distribution business in Northern Ireland. Save for the activities of these two companies, we have no other commercial activities in the United Kingdom. In relation to our business in the Netherlands, Ireland and Northern Ireland, our suppliers comprise large and well-established companies, primarily in the petroleum industry. Irving Oil also engages with a number of contractors for professional and other services locally and on behalf of our subsidiaries in Ireland and Northern Ireland.

Risk Assessment and Training

We consider the jurisdictions in which Irving Oil operates to be low risk in relation to modern slavery. Nevertheless, we recognize that all organizations are susceptible to the risk of overlooking modern slavery in all its forms. Irving Oil employees are required to comply with all applicable laws and adhere to Irving Oil Group policies. Further, employees are expected and encouraged to raise concerns with management, who then take action.

Policies

Irving Oil Group’s Code of Ethical Conduct (the “**Code**”) is designed to communicate its expectations for ethical business conduct and to provide guidance to all employees as they apply these principles every day in performing their responsibilities. The Code includes systems, controls, and guidance for employees to help prevent unethical business behaviours from taking place within Irving Oil’s business and supply chains, and information on how to identify, assess and address unethical business behaviours. Irving Oil aims to

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have appropriate policies in place that underpin its commitment to comply with all applicable laws in the jurisdictions in which it operates. We continuously review and update all our policies.

Following a review of the effectiveness of the actions we have taken this year to combat the risk of slavery and human trafficking in our business and supply chains, we note the updated Transparency in Supply Chains statutory guidance issued in March 2025 and are currently reviewing our policies in line with our commitment to continually improve and strengthen our approach year-on-year.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Irving Oil Whitegate Refinery Limited and John Kelly Fuels (Ireland) Unlimited Company's modern slavery and human trafficking statement for the financial year ended 31 December 2024.

This statement was approved by the boards of Whitegate Refinery and John Kelly Fuels (Ireland) Unlimited Company on July 3, 2025.

A handwritten signature in black ink, appearing to read "Jeff Matthews", written over a horizontal line.

Jeff Matthews
Director

John Kelly Fuels (Ireland) Unlimited Company
Irving Oil Whitegate Refinery Limited

A handwritten signature in blue ink, appearing to read "John Laidlaw", written over a horizontal line.

John Laidlaw
Director

John Kelly Fuels (Ireland) Unlimited Company
Irving Oil Whitegate Refinery Limited