

## SICCAR POINT ENERGY – MODERN SLAVERY ACT 2015 STATEMENT

### Anti-Slavery and Human Trafficking Statement

The Siccar Point Energy Group has a zero tolerance approach to modern slavery and is committed to ensuring that there is no modern slavery or human trafficking in any part of its business, including its supply chain. The Group complies with all requirements of the Modern Slavery Act 2015.

**Siccar Point Energy has the following measures in place to reduce the risk of modern slavery affecting its business and supply chain:**

#### Policies and Procedures

Siccar Point Energy has policies on critical supply chain guidance, anti-bribery and corruption and whistle-blowing which focus on maintaining positive relationships with all counterparties, including business partners, suppliers and the wider communities in which we work.

The policies promote working within the laws and regulations of the countries in which we operate (including, by implication, those relating to forced/involuntary labour and human trafficking), promoting high ethical standards and a culture whereby people are empowered to report issues of concern. Business integrity is a key standard for selection of partners, contractors and other organisations with which the Siccar Point Energy Group works. This policy is communicated to all employees and compliance with its requirements is a condition of employment with the Group.

The Group is committed to providing safe and healthy working conditions for its personnel. Our template contractual terms require the highest standards of business ethics, compliance with applicable laws and commitment to health, safety and the protection of the environment. Siccar Point Energy conducts its business as a responsible corporate citizen.

#### Supply chain

Our suppliers are local, national and international. We look to procure products and services from high quality and high integrity suppliers. We achieve this through a robust selection process and ongoing management of suppliers who fully comply with our safety, environment, technical standard and ethical standards.

#### Contractual terms

Siccar Point Energy's template contractual terms for suppliers require the highest standards of business ethics, compliance with all applicable laws and commitment to health, safety and the protection of the environment and personnel.

#### Reporting concerns

By encouraging a culture of openness within our organisation Siccar Point Energy aims to prevent malpractice. We encourage all employees to raise issues which concern them at work through the Whistleblower Policy details of which are available on the Siccar Point Energy intranet.

## **Risk Assessment**

Siccar Point Energy has undertaken an internal risk assessment to identify and assess potential risks in our supply chain relating to modern slavery and human trafficking. The Siccar Point Energy Group does not operate in jurisdictions or in a sector which has particular risks associated with slavery and human trafficking but, to the extent risks have been identified, appropriate steps have been taken to mitigate and monitor such risks as outlined above.

Siccar Point Energy is committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business, and that the same high standards are applied by our business partners. The Siccar Point Energy Group has a robust set of guidelines and policies in place that inform our work, and ensure that we are considering the impact of our corporate behaviour as appropriate.

At the time of writing, Siccar Point Energy is not aware of any current or recent incidents, nor accusations of forced/involuntary labour or human trafficking in our operations or those of our business partners.

This statement was reviewed and approved by the board of Siccar Point Energy E&P Limited, as our primary operating company, but also applies to all other companies within the Siccar Point Energy Group: Siccar Point Energy (Holdings) Limited, Siccar Point Energy (Finance) Limited, Siccar Point Energy U.K. Limited, Siccar Point Energy Limited and Siccar Point Energy Bonds plc.

Approved by Jonathan Roger, Chief Executive Officer

22 March 2019