



## ANTI-SLAVERY & ANTI-HUMAN TRAFFICKING STATEMENT



**This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015, and constitutes Assala Energy U.K. Limited's anti-slavery and anti-human trafficking statement for the fiscal year ending 31 December 2018.**

### **Introduction**

On October 31, 2017, Carlyle-backed Assala Energy completed the acquisition of Shell's onshore assets, comprising five operator fields (Rabi, Toucan/Robin, Koula/Damier, Gamba/Ivinga and Bende M'Bassou/Totou), and interests in four non-operated fields (Atora, Avocette, Coucal, and Tsiengui).

In addition, Assala Energy owns related infrastructure to support its production, including a network of onshore pipelines and an export terminal.

The operations were previously under the Shell Group of companies for most of 2017, and due diligence of existing labour practice and conditions conducted prior to the acquisition did not identify any issues. This statement describes the steps that Assala Energy has taken in its tenure over the Gabon operations to ensure heightened sensitivity to the serious issue of human slavery and trafficking. This statement relates to actions and activities undertaken during Assala Energy's period of ownership through the financial year ending 31 December 2018.

### **Organisation and Supply Chain**

Assala Energy UK Limited oversees oil and gas operations in Gabon, and principally through its Gabon affiliates, Assala Gabon SA and Assala Upstream Gabon SA, engages suppliers of goods and/or services primarily in Gabon, but also in the UK and abroad. The Assala Group of companies sells its oil production in Gabon to two buyers.

### **Our Commitment**

Assala Energy is committed to conducting its activities in a manner that respects individual human rights as set out in the United Nations ("UN") Universal Declaration of Human Rights and the core conventions of the International Labour Organization. Our Code of Conduct underscores our core principles and values, including integrity and respect. We expect our staff and suppliers or third parties working on our behalf to adhere to the Code of Conduct, which makes clear that Assala Energy does not tolerate under-age, forced or bonded labour in our operations. Serious violations of our Code of Conduct by suppliers can be grounds for termination of their contract.



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Assala Energy's Code of Conduct encourages employees to "speak up" by reporting actual or suspected violations of the Code of Conduct. While there are various reporting options, Assala Energy instituted "SafeCall", an anonymous means to raise concerns of violations of the Code of Conduct, including where fundamental labour rights and respect for human dignity are in jeopardy. SafeCall is offered in French and English, and is designed so that staff, suppliers and contractors have a means of communicating potential violations of our Code of Conduct when they do not otherwise feel comfortable speaking internally to their managers or other resources. During the calendar year ending 31 December 2018, Assala Energy has not received any notification of issues related to modern slavery.

Assala Energy conducts annual audits against IFC performance standards, which include human resources, labour and working conditions. Any deficiencies or opportunities for improvement are incorporated into a performance improvement plan and reported to our lenders

Assala Energy will continue its efforts in 2019 to build even stronger commitments and alliances to help in the global movement to eradicate modern slavery and human trafficking. During 2018, Assala Energy completed its annual training in and certification of compliance with the Code of Conduct, added queries of labour issue to its due diligence queries and contractual obligations in our supply chains, and continue to raise awareness throughout our operations. We expect and require suppliers, through robust post-ward contract management, to maintain ethical business practices, including measures to prevent slavery and human trafficking in their businesses.

### Approval

This statement has been approved by the Board of Directors of Assala Energy UK Limited, and has authorized a director, Mr. David Roux, to sign the statement.

Signed on behalf of Assala Energy UK Limited.

**David ROUX**  
Director  
June 27, 2018