

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT



## Introduction

Section 54 of the Modern Slavery Act 2015 creates offences in respect of all forms of modern slavery including forced or compulsory labour, slavery, servitude and human trafficking.

This Statement constitutes Assala Energy UK Limited's anti-slavery and anti-human trafficking statement for the fiscal year ending 31 December 2021.

## About our business

Assala Energy UK Ltd oversees oil and gas exploration, development and production by its affiliates, Assala Gabon SA and Assala Upstream Gabon SA (collectively "Assala Energy") related to several onshore exploration and production licences. In addition, Assala Energy owns related infrastructure to support its production, including a network of onshore pipelines and an export terminal.

Our strategy is to invest in mid-life and mature assets to increase production and extend field life cycles. We have about 490 employees based in Gabon and the UK.

## Our commitment to preventing modern slavery

Assala Energy is committed to combating all forms of modern slavery and to taking reasonable steps to ensure that our supply chain and all other parts of our business are free from modern slavery and human trafficking. We recognise our responsibility to work collaboratively with our suppliers, employees, communities, and external stakeholders to reduce the risks of modern slavery in our operations and supply chain.

## HOW ASSALA ENERGY PREVENTS MODERN SLAVERY

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### Our Supply Chain

Assala Energy's business is supported by a diverse range of international and Gabonese suppliers providing goods, services, equipment and materials needed for our operations. These suppliers are fundamental to our operations and as such it is critical that they perform their services in a manner consistent with our Code of Conduct and relevant policies.

### Our Policies and Procedures

Assala Energy is committed to conducting its activities in a manner that respects individual human rights as set out in the United Nations Universal Declaration of Human Rights and the fundamental conventions of the International Labour Organization. Our Code of Conduct specifically states that Assala Energy does not tolerate any form of human trafficking, forced or bonded labour or the exploitation of children or vulnerable persons in our business or our supply chain. In addition, we are committed to operating and maintaining safe working conditions and ensuring the health and wellbeing of everyone in all our work locations.

The Assala Energy Code of Conduct underscores our core principles, our Spirit and Values, including integrity and treating individuals with dignity and respect. We require our employees, suppliers and third parties working on our behalf to adhere to the Code of Conduct and policies including our Health, Safety, Security and Environment (HSSE) Policy, Anti-Bribery and Corruption Compliance Policy, and the Equality, Diversity and Inclusion Policy. Violations of our Code of Conduct or policies can be grounds for termination of contract and discontinuation by Assala Energy of the relationship with a supplier.

### **Integrity due diligence and assurance**

Our Contracts & Procurement procedures set out requirements for engagement of suppliers to provide goods and services to Assala Energy. Also, our integrity due diligence process requires suppliers to provide information in respect of human rights and labour conditions practices.

Assala Energy's standard contractual terms with suppliers requires the highest standard of business ethics, compliance with all applicable laws and commitment to health, safety and protection of the environment by all our suppliers. We expect and require suppliers to uphold and maintain ethical business practices, including measures to prevent slavery and human trafficking in their businesses.

### **Training**

All Assala Energy employees, including new hires, are required to complete an annual Code of Conduct training to support employees in applying the Code in their daily activities. The training in 2021 included reinforcement of awareness of the Code's requirements on modern slavery.

### **Other measures**

Assala Energy encourages everyone to "Speak Up" by reporting actual or suspected violations of the Code of Conduct, policies or procedures. Assala Energy has in place, in addition to other reporting options, an anonymous whistleblowing service so that concerns about any breach can be raised, including where fundamental labour rights and respect for human dignity could be in jeopardy. This whistleblowing service is available in several languages, and is designed so that anyone who wishes to, has a means of reporting potential violations in a safe and secure manner.

Assala Energy conducts annual audits against International Finance Corporation (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 relevant stakeholders. For the IFC audit conducted in 2021, Assala Energy was found to be in material compliance with relevant performance standards, though several areas required minor improvements. These are currently under review.

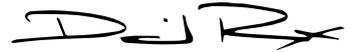
### Looking ahead

Assala Energy will continue to commit to the eradication of modern slavery and human trafficking and to emphasise to our suppliers and employees the importance of ensuring that there is no modern slavery or human trafficking anywhere in our operations. An ongoing priority for our business is keeping our workforce safe and ensuring our behaviours and practices are fully aligned with Assala Energy's Spirit and Values. As we progress our focus on labour rights and modern slavery, we will seek to find new ways to improve our processes for managing the risk of modern slavery in our supply chain.

### Approval

This statement has been reviewed and approved by the Board of Directors of Assala Energy UK Limited.

Signed by David Roux, on behalf of Assala Energy UK Limited.



**David ROUX**

Director / Chief Executive Officer

March 2022