

# ASSALA ENERGY MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



This statement is made pursuant to the Modern Slavery Act 2015 for the financial year ending 31 December 2024.



## INTRODUCTION

This is Assala Energy's 6th modern slavery statement and sets out the steps Assala has taken to identify and mitigate modern slavery risks in our operations and supply chain.

Assala is committed to preventing all forms of modern slavery within our operations and supply chain by maintaining and improving our processes and conduction or operations in an ethical manner. We remain fully focused on ensuring that our business operations are free from all forms of modern slavery.

The Assala Spirit and Values embody our commitment to sustainability and our positive contributions in the communities where we operate.

## Our Organisation and operations

Assala Energy's operations are in oil exploration and production from mid to mature life cycle assets related to several onshore exploration and production licences in Gabon. We also own infrastructure to support our oil production, including a crude oil export terminal. Our structure and complex operations mean that we have a broad range of stakeholders for our business.

## Our Commitment

Assala recognises that modern slavery is a global concern, and we are committed to:

- Respecting the requirements set out in the Universal Declaration of Human Rights, the core labour standards recognised by the International Labour Organization, and the relevant UN Sustainable Development Goals.
- Acting ethically and responsibly in conducting our operations.
- Implementing systems and controls to identify and manage any risks of modern slavery in our supply chain.
- Identifying ways to increase awareness in our workforce of the risks of modern slavery and human trafficking.

## Our Supply Chain

Assala engages with over 400 vendors and maintains a diverse supply chain across multiple sectors including logistics, marine services, catering, information technology and equipment manufacturing. Our suppliers provide a broad range of goods and services activities such as drilling, waste management, construction and security of assets.

We are committed to partnering with suppliers who uphold our values, particularly with respect to human rights, health and safety and ethical business conduct. Supplier selection is done using objective criteria such as demonstrated performance, health and safety, and quality assurance.

We hold our suppliers, vendors and contractors to stringent standards relating to anti-corruption, compliance with labour regulations and sustainability. Our standard terms and conditions contractually obligate all counterparties to comply with applicable laws, including labour regulations, Assala's Code of Conduct and policies.

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## Risk Assessment and due diligence

Assala conducts different activities to manage risks of modern slavery in our supply chain. This includes analysis of contract workscope to identify any services where there may be a higher risk of modern slavery. Prior to contract award, Assala conducts thorough due diligence reviews, during which information on key risk areas is requested. Vendors are screened to identify any violations of human rights, forced labour practices or breach of international regulations on human trafficking.

In addition to our Speak Up channels, Assala maintains a complaints procedure for suppliers and contractors to raise workplace issues and concerns.

## Supplier Engagement

Engagement and collaboration remain a fundamental part of how we ensure that our suppliers wholly embrace the Assala values and our commitment to preventing modern slavery. Through engagements, our suppliers are reminded of our expectation of performing activities in an ethical manner as well as the shared obligation to prohibit all forms of modern slavery in our operations. Our supplier business performance review is used as an opportunity to engage with suppliers on their services, to reiterate expectations and receive feedback.

## Our Policies

The necessity and responsibility for respect of human rights and avoidance of the risk of modern slavery is embedded in our Code of Conduct, policies and procedures. Our Code of Conduct specifically prohibits human trafficking, forced or bonded labour or the exploitation of children or vulnerable persons. Our policies reinforce our commitment to operating and maintaining safe working conditions, and the wellbeing of everyone involved in our operations.

All employees, contractors and suppliers working for Assala must adhere to the Code of Conduct as well as to all relevant policies including:

- Human rights policy
- Equality, diversity and inclusion policy
- Anti-bribery and corruption compliance policy
- Equality, diversity and inclusion policy
- Anti-harassment policy
- Health, safety, security and environment Policy
- Sustainable procurement policy

Any violations of our Code of Conduct or policies may result in termination of contract for employees or discontinuation of a contractual relationship.

## Training and raising awareness

Assala staff are required to complete mandatory annual refresher training on the Code of Conduct. Training is also assigned to employees on related policies using a risk-based approach. In addition to training, we continue to raise awareness and reinforce expectations through other means including internal communication and working with our compliance ambassadors embedded within our business.

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## Effectiveness and Reporting

We continue to monitor the effectiveness of our activities through various methods including employee engagements and performance reviews, the number of reported concerns on labour practices received through our Speak Up channels, and our supplier business performance reviews.

## LOOKING AHEAD

In the next 12 months, we plan to continue our progress on managing the risks of modern slavery in our supply chain and operations by various actions including gathering employee feedback through site visits, surveys and other mechanisms, reviewing our supplier contract terms and conditions to ensure that they clearly establish obligations regarding implementation of adequate measures to mitigate risks of modern slavery and human trafficking and conducting supplier audits. We will also reassess our unexecuted plans from last year including introducing enhanced due diligence for high risk suppliers and implementing a Supplier principles of conduct with a view to determining best course of action.

We will continue to seek new ways to improve how we manage the risk of modern slavery in our supply chain.

## APPROVAL

This statement has been approved for signature by the Board of Directors of Assala Energy UK Ltd.

Marcellin SIMBA NGABI

Director  
June 2025