

Modern Slavery and Human Trafficking Statement 2023





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About this Modern Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement, which relates to the financial year ending 31 December 2023, is published by Harbour Energy plc and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

For more information about our:



Code of Conduct, please visit:

<https://www.harbourenergy.com/about-us/values-code-of-conduct/>



2023 Annual Report, please visit:

[harbourenergy.com/media/14zgz2n/harbour_energy_plc_annual_report_and_accounts_2023.pdf](https://www.harbourenergy.com/media/14zgz2n/harbour_energy_plc_annual_report_and_accounts_2023.pdf)

Business Partner Code of Conduct, please visit:

<https://www.harbourenergy.com/about-us/our-policies/>



Harbour Energy

We are the largest London-listed independent oil and gas company, and as at the reporting date we employed approximately 1,700 employees and 350 direct contractors globally. We also have approximately 2,400 suppliers, many of whom engage sub-contractors to provide goods or perform services for us. The relevant subsidiaries for the purpose of this Statement are as follows:



Our commitment

Harbour Energy is committed to respecting human rights (as set out in the United Nations Universal Declaration of Human Rights) by preventing modern slavery in our supply chain and to upholding worker welfare standards (as defined by the ILO Core Labour Standards) throughout our operations and we expect our suppliers to do the same.

Our commitment and expectations with respect to modern slavery and worker welfare are set out in our Code of Conduct, supported by other Harbour Energy processes which form part of our wider ethics and compliance framework including:

- Supply Chain Policy;
 - Supply Chain Contracting and Procurement Procedure;
 - Supply Chain Contracting and Procurement Standard;
 - Contractor Due Diligence Standard;
 - Sustainability Policy;
 - Whistleblowing Procedure;
 - Human Rights Statement; and
 - Business Partner Code of Conduct
- (together the Harbour Energy Policies). The Harbour Energy Policies apply to all Harbour Energy directors, officers, employees and contractors.

Over the last year, Harbour Energy has undertaken the following specific actions in the following key areas:

1. Compliance programme

Commenced the implementation of the recommendations arising out of an independent third-party review of our Compliance Programme, including compliance with the Harbour Energy Policies, carried out at the beginning of 2023.

2. Due diligence

Developed and rolled-out a new third-party risk management tool which screens suppliers before they are onboarded and monitors them through the lifecycle of our relationship with them. Screening and monitoring identifies relevant risks that a supplier could present to Harbour Energy including the potential for a human rights, modern slavery and/or worker welfare violation within our supply chain. Where we identify such risk, we will perform enhanced due diligence in accordance with the Harbour Energy Policies.

3. Human rights

Commissioned an independent high-level risk assessment, designed to quantify and prioritise the level of human rights risk, including exposure to forced labour and worker welfare violations across our global operations. The findings from this assessment will inform any changes that we need to make to our current action plan regarding the highest risk operations.



Due diligence and supplier management

We take a risk-based approach to assessment and identification of compliance risk in our supply chain and across our business, including in relation to human rights, modern slavery and worker welfare risk, and have the following controls and systems in place:



Screening and monitoring suppliers

Our Contractor Due Diligence Standard requires all new contracting entities to be screened and each contract to be risk-assessed based on value and activity. Once the screening has been performed, the results determined and the supplier has been onboarded they are then to be monitored for the duration of the contractual relationship with us.

For medium and high-risk suppliers, we supplement the initial screening with a follow-up questionnaire, requiring the relevant supplier to provide us with specific information regarding their compliance programme, including human rights policies, and seek confirmation in relation to any historic human rights violations.

Where we identify any specific concerns in relation to human rights, modern slavery or worker welfare risks, we would take appropriate action, including enhanced due diligence, mitigations and the possible discontinuation of our engagement with a supplier.



Contracts

Our contract templates and Harbour Energy Policies are updated periodically to reflect any changes to applicable laws and regulations, including in respect of modern slavery. We have developed and implemented contract templates giving us the right to terminate a contract in the following circumstances, where a supplier:

- has engaged or engages in improper conduct that would breach their obligations to us in relation to applicable laws, including modern slavery and worker welfare;
- has failed to comply with the principles and standards of our Core Values and Code of Conduct; or
- has violated its own code of conduct.

This right is included across all updated templates, including purchase order terms and conditions, which represent the majority of our contracts.

In all circumstances where we believe that our suppliers have not met our expectations or their contractual obligations, we will take appropriate action.



Risk assessments for new operating locations and partnerships

We also have processes in place to risk assess new country entries and new partnerships. As part of this, we carry out above ground risk assessments (including an assessment of human rights considerations, where relevant) and third-party due diligence investigations through reputable and established service providers.

Speak up

One of Harbour Energy's Core Values is Integrity - which means always doing the right thing in a professional, respectful and honest way.

As part of this value, we expect our employees and contractors to speak up if they identify or hear about any instance of human rights, modern slavery or worker welfare violation in our operations or our supply chain. In addition, the Harbour Energy Policies state that we have zero tolerance for retaliation against anyone who raises a concern in good faith and any threat or intimidation will result in disciplinary action.

We expect our suppliers to have equivalent speak up mechanisms available to workers in their supply chain and are continuing to work with them to ensure that is the case.

In 2023 Harbour Energy's Board endorsed a Business Partner Code of Conduct. The Business Partner Code of Conduct is a guide to ethical decision-making and sets out the behaviours and standards expected of those working with or on behalf of Harbour Energy.

The Business Partner Code of Conduct reflects our commitment across our business and supply chain to upholding the highest standards of business conduct including zero tolerance for any form of modern slavery in any form anywhere including forced labour, child labour or human trafficking.





Our supply chain

Our supply chain consists of local, national and international third-party providers of goods and services. We have a dedicated team responsible for managing the supply chain, including for the tendering of contracts, award of contracts and successful execution of those contracts.

In our joint venture operations where we are not the operator, we expect the operator to have in place the necessary processes and procedures for mitigating the risk potential human rights violations within their business and supply chain and to take steps to ensure that they comply with all applicable laws and regulations.



KPIs

Below are the key performance indicators (KPIs), and results, we used to measure effectiveness in identifying the potential for human rights, modern slavery and worker welfare violations in 2023:

- The percentage of suppliers that are identified as high, medium or low risk:

2023 Results: High: 10%; Medium: 8%; Low: 82%

- The percentage of operations that are identified as high, medium or low risk:

2023 Results: High: 20%; Low: 80%

- The percentage of suppliers who receive a questionnaire including specific questions on their human rights, modern slavery and/or worker welfare policies:

2023 Results: 100% of High & Medium risk suppliers

- The percentage of suppliers who are asked to confirm whether they have had any history of violations of human rights, modern slavery and/or worker welfare policies:

2023 Results: 100% of High & Medium risk suppliers

To reflect our improved risk management capability, and to more accurately measure our effectiveness in identifying the potential for human rights, modern slavery and worker welfare violations, we have updated our KPIs for 2024, which are:

- the percentage of operations assessed as high, medium or low risk;
- the percentage of suppliers screened for any violations of human rights, modern slavery and/or worker welfare regulations;
- the percentage of suppliers assessed as high risk and subject to enhanced due diligence (incl. specific questions on their human rights, modern slavery and worker welfare); and
- the percentage of relevant employees trained in human rights, modern slavery and worker welfare.



Next steps

We consistently review the steps we take to identify and prevent, as far as possible, the risk of modern slavery taking place in our supply chain. We do this by working with our supply chain and, where appropriate, consulting with advisers.

We believe that this focus will help to improve detection of human rights, modern slavery and worker welfare risk.

We recognise that we must continue to review and evolve our work in this area, including to:

- continue to engage with relevant suppliers to ensure that they have effective speak up mechanisms for concerns expressed when working for us, including via the full roll-out and socialisation of our newly published Business Partner Code of Conduct;
- continue to train and raise awareness of our relevant employees and contractors, including embedding our new third-party risk management tool;
- where appropriate, evaluate compliance with modern slavery and worker welfare practices during site visits to suppliers' premises; and
- continue to consult with our peers and other organisations with a similar profile to ours as our processes evolve.

Confirmation statement

This statement has been approved by the Harbour Energy plc Board and each of its relevant subsidiaries, in compliance with the UK Modern Slavery Act 2015.

Linda Z. Cook
Chief Executive Officer
6 March 2024



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Further reading



[HARBOURENERGY.COM](https://www.harbourenergy.com)



[CODE OF CONDUCT](#)



[2023 ANNUAL REPORT & ACCOUNTS](#)

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