

MODERN SLAVERY AND  
HUMAN TRAFFICKING  
STATEMENT

2025





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### For more information about our:

#### 2025 Annual Report



#### Code of Conduct, please visit:

<https://www.harbourenergy.com/who-we-are/our-values-and-code-of-conduct/>

#### 2025 Annual Report, please visit:

<https://www.harbourenergy.com/investors/results-reports-and-presentations/>

#### Business Partner Code of Conduct, please visit:

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





# Modern Slavery and Human Trafficking Statement 2025

This Modern Slavery and Human Trafficking Statement, which relates to the financial year ending 31 December 2025, is published by Harbour Energy plc and its relevant subsidiaries<sup>1</sup> in compliance with the UK Modern Slavery Act 2015.

Harbour Energy is committed to respecting human rights by preventing modern slavery in our supply chain and to upholding worker welfare standards throughout our operations, and we expect our suppliers to do the same. We recognise that modern slavery in any form is a crime and a serious violation of human rights. It is fundamentally contrary to our company values and our way of doing business.

This annual statement reflects a period of transformation at Harbour Energy, following the Wintershall Dea transaction in September 2024. We recognise that our changing size and global portfolio have implications for modern slavery

risk, and so in 2025 we engaged an external human rights organisation to review our current human rights and modern slavery due diligence approach against the United Nations (UN) Guiding Principles on Business and Human Rights. This annual statement is informed by that analysis and the resulting recommendations.

In Norway, Harbour Energy Norge AS prepares a statement of due diligence according to Section 5 of the Norwegian Transparency Act that includes information on our efforts to promote respect for human rights and decent working conditions. The statement is available on the Harbour Energy website.

## KEY STEPS IN THE PAST 12 MONTHS

Commissioned an independent review of our human rights and modern slavery due diligence.

Assessed human rights risks in our portfolio, including forced labour risk.

Conducted a human rights audit of a contractor.

Piloted supplier screening tools and supplier platforms in our business units.

Published disclosures in relation to the Norwegian Transparency Act and the UK Modern Slavery Act.

## We have also initiated work in the following areas which is ongoing:

Updating our policy framework on modern slavery due diligence.

Clarifying governance and management roles for modern slavery risk management.

Developing additional metrics to track progress as we strengthen our modern slavery risk management approach.

## OUR VALUES

### We care

We care about each other, our safety and the environment.

### We work together

We work together, achieving more through communication and collaboration.

### We aim high

We aim high, seizing opportunities and embracing challenges.

### We deliver

We deliver with a can-do attitude.

<sup>1</sup> The relevant subsidiaries for the purpose of this statement are Chrysaor Limited, Chrysaor North Sea Limited, Chrysaor Petroleum Company U.K. Limited, Chrysaor Production (U.K.) Limited, Chrysaor (U.K.) Sigma Limited, Harbour Energy Marketing Limited and Premier Oil UK Limited.



# Our business and supply chain

## Our business

Harbour Energy is one of the world's largest and most geographically diverse independent oil and gas companies. We have assets and interests in the UK, Norway, Germany, Indonesia, Mexico, Argentina, Algeria, Egypt, Denmark and Libya. We also have a leading CO<sub>2</sub> storage position in Europe.

Our business model includes offshore and onshore production, including assets that we operate, and others that are operated by our joint venture (JV) partners.

In 2025, production materially increased, up 84 per cent to 474 kboepd, reflecting a full year's contribution from the Wintershall Dea portfolio.

Worldwide, we employ around 3,200 people, of whom 90 per cent are employees, with the remainder direct contract staff. The majority of our employees and direct contract staff are in Europe, 74 per cent, with 16 per cent in Asia, eight per cent in Argentina and Mexico and under two per cent in North Africa.

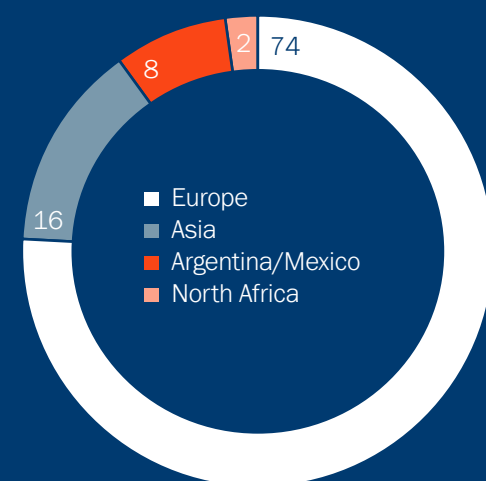
# +84%

increase in production

# 3,200

employees

### Percentage breakdown of location of employees and direct contract staff



## Our supply chain

Our suppliers include local, national and international suppliers that provide goods and services to our organisation.

We have around 3,455 suppliers in our procurement system, and many of our suppliers engage subcontractors to provide goods or services for us. Our suppliers include those that provide support services for our onshore and offshore facilities, such as security, logistics, catering, cleaning and waste management, as well as specialist technical services such as engineering and drilling services. Most procurement occurs through our business units.

Where we are the operator in a joint venture, we have a greater influence over the management of the operations, including the protection of labour rights and prevention of modern slavery. At assets operated by our JV partners, it is the operator who manages supply chain procurement. We expect our JV partners to implement appropriate due diligence on modern slavery risks within their business and supply chain. We also seek to build strong relationships with our JV partners so that we can use our influence and expertise to support good practice.



# Policies in relation to modern slavery

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We have four key policies that set out the framework for due diligence on modern slavery for our own business, and for our suppliers, contractors and partners – our Code of Conduct, Business Partner Code of Conduct, Human Rights Statement and Supply Chain Policy. These policies reflect our commitment to uphold the highest standards of business conduct and respect human rights by preventing modern slavery in our supply chain and upholding worker welfare standards throughout our operations.

We also have policies and standards that establish our wider human rights framework, including on whistleblowing; supply chain contracting and procurement; diversity, equity and inclusion; sustainability; people; and health, safety, environment and security (HSES).

To view our policies, please see: <https://www.harbourenergy.com/who-we-are/leadership/policies/>

We promote our speak up channel, Safecall, and encourage people to speak up without fear of retaliation. 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. 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 business partners 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.

## Continuous improvement

Over the next 12 months, we will be updating our policies to:

- Strengthen the framework for the implementation of human rights and modern slavery due diligence in line with international good practice and standards such as the UN Guiding Principles on Business and Human Rights.

# Governance

The Board is collectively responsible for the governance of the company on behalf of Harbour's shareholders and is accountable to them for the long-term sustainable success of the company. The Board has established committees which assist the Board in discharging its duties in certain areas. Each of the committees (Nomination Committee, Audit and Risk Committee, Health, Safety, Environment and Security Committee and Remuneration Committee) has formal terms of reference, copies of which can be found on Harbour Energy's website.



The Board and its committees are supported by an experienced Leadership Team, led by our CEO. The Leadership Team is responsible for implementation of the Board-approved strategy, for safe and responsible delivery of our operational targets and capital investments, and for building and leading our organisation.

Accountability for modern slavery compliance sits with the Chief Ethics and Compliance Officer, and ultimately with the CEO. Responsibility for modern slavery risk management sits with various functions, including legal, HSES, human resources and supply chain.

## Continuous improvement

Over the next 12 months, we will:

- Develop a roadmap in 2026 to prioritise our vendors in line with our contracts and procurement procedure. This allows Harbour to conduct the appropriate human rights due diligence on its vendors.
- Create a cross-functional and cross-business unit working group where information and capability on human rights due diligence, including modern slavery risk management, are discussed and shared.

# Risk assessment

Salient human rights risks we focus on are:

- Worker welfare in the supply chain (recruitment fees, contract clarity, migrant worker protection).
- Health, safety and wellbeing (excessive working hours, fatigue, mental health).
- Unequal treatment in employment (discrimination, harassment, bullying).
- Environmental impacts affecting workers and communities.
- Risks related to licence partners' activities in partner-operated assets.

## Own operations

Each year, we engage an independent contractor to conduct a data-led human rights risk assessment of country-level risks. The assessment includes a review of all human rights risks, including forced labour and human trafficking. It identifies countries where the inherent risk of forced labour is high, and we recognise this may affect local supply chains, even if risks at our own sites are low.

## Continuous improvement

- We plan to review and monitor our suppliers in our human rights risk assessments who have been assessed as medium or high risk during our initial screening. We will develop a detailed roadmap to enable us to prioritise due diligence and mitigation of forced labour risks for contracts where such risks have the highest potential to occur.



# Due diligence: steps to address risk

We take a risk-based approach to assessing and identifying compliance risks 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:

The key due diligence steps we apply include:

- 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.
- Screening and monitoring identify relevant risks that a supplier could present to Harbour including the potential for a human rights, modern slavery and/or worker welfare violation within our supply chain.
- Once we complete the screening and onboard the supplier, we monitor them for the duration of the contract.
- For medium and high-risk suppliers, we supplement the initial screening with a follow-up questionnaire, requiring the supplier to provide specific information regarding their compliance programme, including human rights policies, and we 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 take appropriate action, including enhanced due diligence and implementing appropriate mitigation actions.

- We provide access to Safecall, a whistleblowing hotline which is available to all workers and can be accessed in any language, at any time. We promote a speak up culture and share information about Safecall with our workforce and business partners. In 2025, we included a link to Safecall in the footer of our website to enhance the visibility of the whistleblowing service to external parties. In addition, we updated our Supply Chain Policy with contact details for Safecall. In the reporting period, we did not receive any reports related to modern slavery.
- We expect people working in our operations and supply chain to be treated with respect and not be subject to discrimination or abusive practices such as forced labour. These expectations are embedded in the terms and conditions of contracts and in our Business Partner Code of Conduct, which also states that we expect our business partners to provide their own complaints channel for their workers.
- Where appropriate, we conduct on-site HSES assessments of our operated assets, as well as audits of our business units against our principal risks, which include risks on HSES and procurement.
- We have processes in place to risk assess new country entries and new partnerships. As part of this, we carry out risk assessments (including an assessment of human rights considerations, where relevant) and third-party due diligence investigations through reputable and established service providers.

In 2025, we commissioned an independent review of our human rights and modern slavery due diligence. The review identified various approaches across our business units to manage modern slavery risk, including examples of good practice that we plan to share across our organisation as we work to enhance our approach to systematic due diligence.

## CASE STUDY:

### Working together on corrective actions

In 2025, we worked with one of our contractors to monitor progress against actions identified in a human rights audit we conducted in 2024.

The contractor was chosen based on potential higher risks associated with the country of production, the use of subcontractors and the level of spend. The audit was conducted by an independent consultancy specialising in third-party audits and human rights, in collaboration with our supply chain managers.

Overall, the audit found that the contractor had robust systems in place to manage working conditions and employed an entirely local workforce, reducing the risk of human rights violations. However, the audit also identified gaps in subcontractor due diligence, with some subcontractor workers found to have paid fees during the recruitment process, which is a driver of modern slavery. We worked with the contractor to agree on a corrective action plan and engaged with them regularly during the year to track and evaluate mitigation and prevention measures.

The audit and resulting corrective action plan provided important learning opportunities for us. It increased our awareness of risk issues in our supply chain and will help to inform how we monitor and address such risks.



### Continuous improvement

- We plan to roll-out use of our third-party screening tool to all our business units to ensure consistent supplier risk screening across our organisation.
- We will strengthen and align approaches to how we screen new suppliers, and monitor existing ones, so that we understand their capability to conduct modern slavery due diligence of their own business and supply chain.
- As we identify risk issues that are most salient to our business and supply chain, we will also seek to partner with industry groups and stakeholders with expertise relevant to modern slavery and human rights due diligence.



# Training and awareness raising

We provide regular training and awareness sessions on ethics and compliance, as well as HSES, highlighting risks to our employees and direct contractors.

In 2025, training relating to modern slavery included:

All our employees and direct contract staff were required to complete mandatory training on our Code of Conduct. This included a module on modern slavery and provided guidance on how to report suspected violations.

We held Compliance Days at each of our business units which included topics related to worker welfare and modern slavery.

We increased the visibility and accessibility of our whistleblowing hotline, Safecall, with our workforce and wider stakeholders via posters at our sites, intranet articles and our website.

We held sessions for people in higher-priority roles and functions (including supply chain, internal audit, HSES, legal, human resources, strategy and business development), as well as business units, to share information on findings and recommendations from the human rights risk assessment conducted by an independent organisation, and to seek input on the development of our human rights roadmap and the resulting actions.

We piloted dedicated training on human rights and modern slavery risk for the procurement function in one of our business units.

## Continuous improvement

- As we update our policies and procedures, we will roll-out training to functions with a key role in modern slavery risk management.
- As we evolve our approach to human rights due diligence in the supply chain, we will identify the most effective way to communicate our requirements to suppliers and contractors, and how to provide support on key risk areas.





# Key performance indicators

Harbour segments its contracts to evaluate the significance of each contract to Harbour Energy. The lower the tier, the greater the significance and the greater the investment Harbour Energy makes to address contract management and risk mitigation.

Corporate risk elements include safety of the workforce, safety of the public, environmental, societal, reputational, security and financial. Within this, Harbour covers compliance with legislation and responses to specific questions on modern slavery.

Contracting and contract risks and opportunities are also addressed, which include market share, changes within the contractor organisation, local content, subcontracted activity, financial stability, as well as the level of supply chain resilience, criticality of the service/materials and the use of technology and innovation. Each element is scored to determine the overall score for each contract and thus define the tier to which the contract belongs.

Harbour will create a roadmap in 2026, capturing relevant compliance with Harbour's policies and procedures relating to modern slavery. The roadmap will outline the five-year plan to address all vendors by the end of 2030. Our KPIs will capture the number of vendors confirming compliance with Harbour's Code of Conduct, any red flags in our due diligence system and any issues raised by our internal teams during audits, vendor visits and business performance reviews.

The percentage of operations assessed as high, medium or low risk<sup>1</sup> is:

- 2025 performance: High: 32%; Medium: 23%; Low: 45%

We also currently collect metrics relating to the proportion of suppliers categorised as high, medium or low risk within our due diligence system, along with the proportion subject to enhanced due diligence.

The percentage of suppliers currently identified in our due diligence system as high, medium or low risk<sup>2</sup> is:

- 2025 performance: High: 11%; Medium: 2%; Low: 87%

All suppliers in our due diligence system are screened and continuously monitored for human rights risk, including potential violations of modern slavery and worker welfare regulations. Suppliers assessed as high risk are required to complete an enhanced due diligence questionnaire, which requests additional disclosures on identified human rights, modern slavery and worker welfare risks and the measures the supplier has implemented to prevent or mitigate such violations.

The percentage of suppliers assessed as high risk who have been issued with our enhanced due diligence questionnaire is:

- 2025 performance: 100%

Operations assessed as high, medium or low risk in 2025

32%  
High

23%  
Medium

45%  
Low

We track additional indicators, such as the number of substantiated allegations of wrongdoing as set out in our Code of Conduct, the percentage of our employees and direct contract staff who complete Code of Conduct training, our performance in closing whistleblowing reports, reported violations of our Modern Slavery and Human Trafficking Statement, the percentage of our workforce covered by collective bargaining agreements, and security-related incidents in our business units with human rights implications. Our safety metrics include employees and contractors, and cover aspects such as total recordable injury rate, high potential incident rate, fatalities and near misses. These metrics are all published on our website in our ESG Datasheet.

## Continuous improvement

As we determine our baseline metrics, we will seek to strengthen our modern slavery due diligence and identify specific improvement goals, which may include:

- Extending our metrics reporting across all operations.
- The capability of our people, for example, through human rights and modern slavery training.
- The prevention measures we implement as we enhance our due diligence approach to the supply chain.
- The outcomes of our due diligence activities in terms of risk reduction and worker welfare.

1 As defined by Verisk Maplecroft's suite of human rights-related indices.  
2 This includes suppliers for Harbour's legacy business only. Harbour has in place supplier due diligence processes across all of its global business. Through 2026, all supplier due diligence will be conducted within a single third-party system, combining both legacy Harbour and Wintershall Dea current supplier due diligence processes.

## GOALS:

# Progress tracker

We recognise our work in identifying and preventing the risk of modern slavery taking place in our business and supply chain will continue to evolve. The following are our objectives for the next 12 months:

- Update our policy framework on modern slavery due diligence.
- Clarify governance and management roles for modern slavery risk management.
- Launch a cross-functional working group for modern slavery risk management.
- Develop additional metrics to track progress as we strengthen our modern slavery risk management approach.

## Statement approval

This statement has been approved by the Harbour Energy plc Board on 4 March 2026 and is made on behalf of the Harbour Energy group of companies in compliance with the UK Modern Slavery Act 2015.

### Linda Z. Cook

Chief Executive Officer,  
4 March 2026

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**Further reading**

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

 [CODE OF CONDUCT](#)

 [BUSINESS PARTNER  
CODE OF CONDUCT](#)

 [SUPPLY CHAIN POLICY](#)

 [2025 ANNUAL REPORT  
& ACCOUNTS](#)

 [NORWEGIAN TRANSPARENCY  
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