

Harbour Energy plc
Modern Slavery and Human Trafficking Statement
(financial year ending 31 December 2021)

1. About this Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement (**Statement**), which relates to the financial year ending 31 December 2021, is published by Harbour Energy plc (**Harbour Energy**) and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

For more information about:

- Our new **Code of Conduct**, please visit https://www.harbourenergy.com/media/at5npxw5/hae_18821-code-of-conduct_-aw_april-5-interactive_updated-2.pdf
- Our **2021 Sustainability Report**, please visit: <https://www.harbourenergy.com/investors/results-reports-and-presentations/>

2. Organisational structure

Harbour Energy is the largest London-listed independent oil and gas company, and we employ approximately 2,000 employees. We also have in excess of 2,000 suppliers and contractors, many of whom engage sub-contractors to perform services for us. The relevant subsidiaries for the purpose of this Statement are as follows:

Chrysaor Limited

Chrysaor North Sea Limited

Chrysaor (U.K.) Sigma Limited

Chrysaor Petroleum Company U.K. Limited

Chrysaor Production (U.K.) Limited

Chrysaor Resources (Irish Sea) Limited

Chrysaor (U.K.) Theta Limited

Premier Oil UK Limited

Premier Oil Aberdeen Services Limited

Premier Oil and Gas Services Limited

3. Our Commitment

Modern slavery is a term used to cover a range of exploitative practices that constitute serious human rights and worker welfare violations within organisations or their supply chains.

This type of exploitation is contrary both to law and to Harbour Energy's commitment and expectations in performing our activities.

Our commitment and expectations with respect to modern slavery are set out in our Code of Conduct, Due Diligence Standard, Supply Chain Policy, Sustainability Policy, Human Rights Statement and related policies (together **Harbour Energy Policies**), which apply to all Harbour Energy employees, officers and members of our Board.

We expect all our contractors and their employees to act in a way that is consistent with the Harbour Energy Policies and, where we believe that our contractors have not met our expectations or their contractual obligations, we will take appropriate action. We also provide ethics and compliance training to all our employees, including on modern slavery.

4. Due diligence

We take a risk-based approach to assessment and identification of modern slavery risk in our supply chain and across our business, based on activity and country risk, and have the following controls and systems in place:

- **Due diligence, monitoring and engagement:**

We perform pre-contract due diligence which enables us to identify whether suppliers and contractors are able to meet the expectations set out in the Harbour Energy Policies. Where we identify that any of our business activities or relationships pose additional risks to people affected by our operations, we will apply additional scrutiny on a case-by-case basis.

- **Screening:**

We screen our new suppliers and contractors and conduct ongoing monitoring of our existing suppliers and contractors by carrying out, among other things, due diligence checks. Our current systems and processes are further enhanced by our supply chain due diligence questionnaire, which further assists us in identifying and addressing any risk of modern slavery occurring in our supply chains.

- **Contracts:**

Our contract templates and Harbour Energy Policies require our suppliers and contractors to act consistently with the Harbour Energy Policies and to comply with applicable law, including in respect of modern slavery.

- **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, if relevant) and third party due diligence investigations through reputable and established service providers.

5. 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 to Speak Up

if they identify or hear about any instance of modern slavery 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.

As part of the direct engagement with key contractors through risk assessment workshops, we now work collaboratively with contractors to ensure that they have equivalent grievance mechanisms available to workers in their supply chain.

6. Our supply chains

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 of modern slavery within their supply chains and take steps to ensure that the operator complies with all laws and regulations applicable to Harbour Energy, including through operation of our audit rights.

7. Our risk assessment workshops

In addition to developing the Harbour Energy Policies 2021, we ran four facilitated risk assessment workshops titled *"Identifying modern slavery, labour exploitation and broader worker welfare concerns in the Harbour Energy supply chain."* The primary purpose of these workshops was to:

- assess the suitability of the current Harbour Energy modern slavery and worker welfare framework;
- identify activities that could present high risk to Harbour Energy; and
- determine the adequacy of the due diligence Harbour Energy performs in respect of modern slavery, both prior to onboarding and as part of contract management for relevant contracts.

We did this by asking three key questions:

- what are the key outsourced activities that present the highest risk of modern slavery in our supply chain?
- to what extent are we able to clearly analyse the sub-contracting levels, tier by tier, where we have concerns in relation to modern slavery?
- what blind spots might there be that restrict our visibility and awareness of where concerns could exist or start to emerge?

These risk assessment workshops helped to identify the material risks that we face.

Our approach and the actions that are required to effectively manage those risks will continue to evolve through focussed engagement with our suppliers and contractors.

8. 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 business and supply chains. We do this by working collaboratively with our supply chain and, where appropriate, consulting with advisers and our industry peers.

We believe that the key findings from the work we began in 2021, and our continuing focus, will help to improve our engagement with contractors and to raise their awareness that, when performing services on our behalf, we expect them to set clear expectations with sub-contractors.

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

- undertake audits of, and hold discussion with, suppliers and contractors, including providing guidance on lessons learnt;
- engage with relevant contractors to ensure that they have effective grievance mechanisms for concerns expressed by sub-contractors relating to working conditions;
- ensure our contracts include audit and information rights, termination/suspension rights for material breach, and reporting and training requirements relating to worker welfare;
- incorporate an evaluation of modern slavery and worker welfare practices during site visits to contractors' premises; and
- consult with our peers and other organisations with a similar profile to ours to understand what they are doing in this area.

9. 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.

08 June 2022