



Modern Slavery and Human Trafficking Statement 2022





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About this Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement, which relates to the financial year ending 31 December 2022, is published by Harbour Energy plc and its relevant subsidiaries in compliance with the UK Modern Slavery Act 2015.

Further information



**Code of
Conduct**

To find out more about our Code of Conduct, please visit:

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



To find out more about our 2022 ESG Report, please visit:

<https://www.harbourenergy.com/safety-esg>



Harbour Energy

We are the largest London-listed independent oil and gas company, and as at the reporting date we employed approximately 1,800 employees and 400 direct contractors globally. We also have in excess of 2,700 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:

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

2,200

Employees and contractors worldwide

2,700+

Suppliers worldwide

Our commitment

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.

Our commitment and expectations with respect to modern slavery and worker welfare are set out in our Code of Conduct which was launched in 2022 and followed by an ongoing programme of employee and contractor training.

In addition, other Harbour Energy processes were launched or subjected to detailed review during 2022, including:

- Supply Chain Policy;
- Supply Chain Contracting and Procurement Procedure;
- Supply Chain Contracting and Procurement Standard;
- Contractor Due Diligence Standard;
- Sustainability Policy;
- Whistleblowing Procedure; and
- Human Rights Statement,

(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. 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 form the basis of an action plan regarding the highest risk operations.

2. Compliance programme

Commissioned an independent third party to review our compliance programme, including compliance with the Harbour Energy Policies, the recommendations from which will be implemented during the course of 2023.

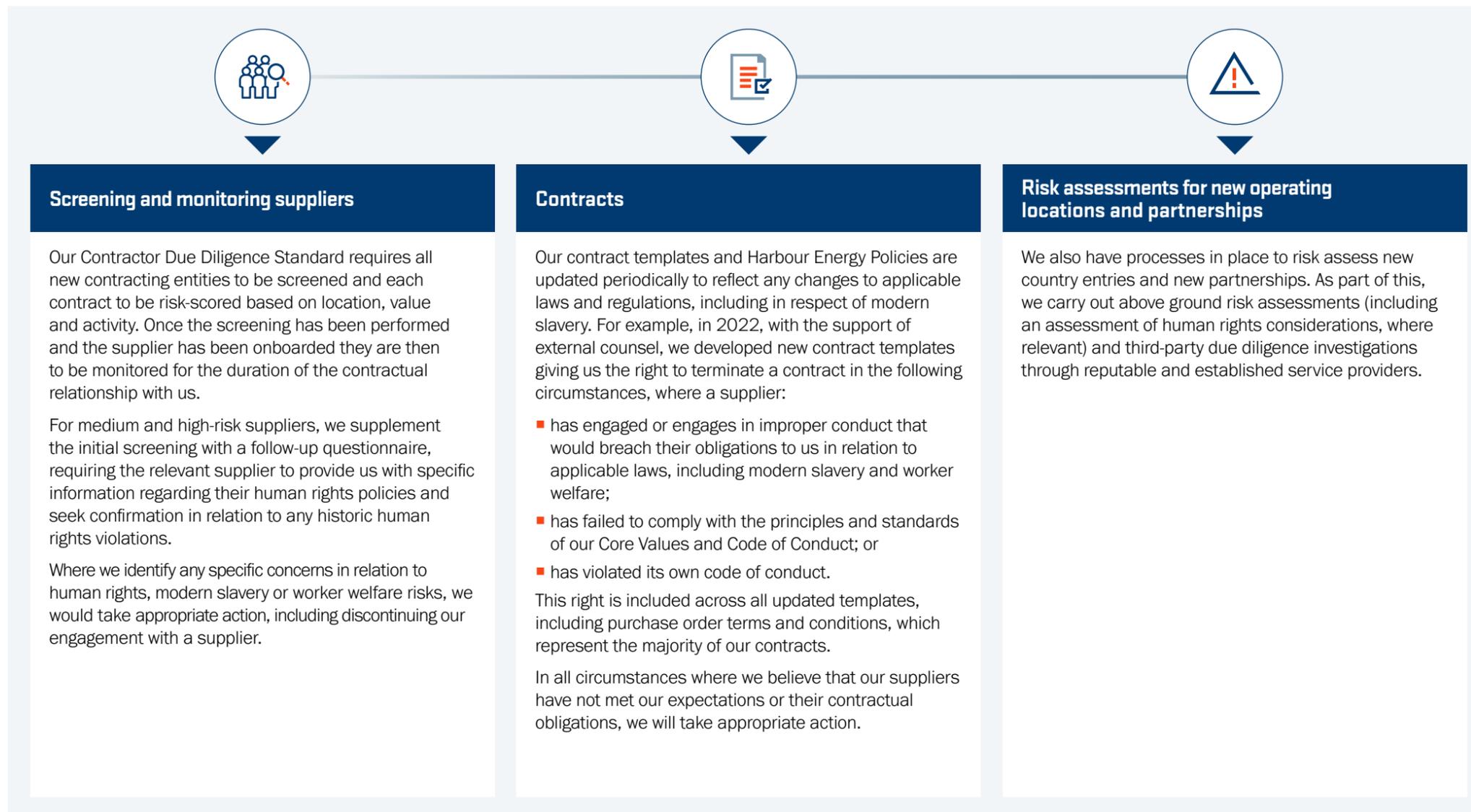
3. Due diligence

Undertaken a detailed gap analysis of the supplier onboarding processes of our legacy businesses (Chrysaor and Premier Oil) and developed a new tool, to come into effect during 2023, which will risk-score contracts on an individual basis, continuously screen and monitor suppliers after they have been onboarded, and manage supplier risk through the lifecycle of our relationship with them. A key part of the improvement will be to identify and mitigate human rights, modern slavery and worker welfare risk in our supply chain.



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:



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.

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 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.





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 of modern slavery within their supply chain and take steps to ensure that the operator complies with all laws and regulations applicable to Harbour Energy.



KPIs for 2023

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

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

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

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

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.

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;
- continue to train and raise awareness of our relevant employees and contractors;
- where appropriate, incorporate an evaluation of 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
8 March 2023

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Further reading



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



[CODE OF CONDUCT](#)



[2022 ESG REPORT](#)