

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT



This statement is made by Assala Energy UK for itself and on behalf of its Gabon affiliate, Assala Gabon SA (collectively, the "Companies") for the financial year ending 31 December 2023.

Any references to 'we' 'us' or 'our' shall be interpreted as references to the Companies as the context requires.



## INTRODUCTION

Our 5<sup>th</sup> modern slavery statement outlines Assala's approach and actions taken during the period to prevent and mitigate modern slavery.

Assala is committed to conducting its business activities ethically and responsibly and this commitment extends to addressing the risks of modern slavery within our operations and supply chain. We are fully focused on making continuous progress in the actions that we take to ensure that our business operations are free from all forms of modern slavery.

We do not tolerate child labour, forced, compulsory or bonded labour, human trafficking or any other form of slavery and actively seek to prevent and mitigate such risks in our business. We respect the requirements set out in the Universal Declaration of Human Rights, the core labour standards recognised by the International Labour Organization, and work to support the relevant UN Sustainable Development Goals.

## **Our organisational structure and operations**

Assala is an oil exploration and production company with operations and investments in mid-life to mature life cycle assets related to several onshore exploration and production licences in Gabon. In addition, Assala owns infrastructure to support our oil production, including a network of onshore pipelines and a crude oil export terminal. Assala works with a diverse range of stakeholders including our employees, suppliers and local communities. Our commitment to corporate responsibility and sustainability is embedded in the Assala Spirit and Values and we strive to ensure that our operations contribute positively to the social and economic development of the areas where we operate.

## **Our supply chain**

Assala works with a wide array of suppliers across our supply chain and seeks to engage suppliers who share our commitment to respecting human rights. Suppliers working for Assala provide goods and services across all our operations including drilling services, waste management, security, logistics and catering. Assala selects suppliers using objective criteria such as health and safety, quality and evidence of performance and business ethics.

We hold our suppliers, vendors and contractors to stringent compliance, anti-corruption, safety and other guidelines and our standard terms and conditions oblige suppliers to adhere to all applicable laws and regulations.

## HOW WE MANAGE OUR MODERN SLAVERY RISKS

### **Risk Assessment and due diligence**

Assala recognises that the risk of modern slavery can exist in various forms and at different levels within our supply chain. Assala assesses these risks within our due diligence processes. In 2023, Assala assessed human rights risks within our own operations as well as within the activities of our suppliers and contractors.

Our due diligence process is designed to review new and existing suppliers across a number of compliance areas (e.g. anti-corruption, sanctions, labour and human rights) as well as using third-party information such as screening platforms to assess risks, including human rights violations.

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## Supplier Engagement

Assala is committed to working collaboratively with our suppliers to ensure that they share our values and commitment to preventing modern slavery. We engage with suppliers to communicate our commitments to ethical business practices, including the prohibition of modern slavery, and our expectations that they will similarly make such commitments. We assess the risk of modern slavery within our supply chain and conduct business performance reviews with our suppliers to hear directly from them on how they are implementing our expectations while performing services from Assala.

In 2023, Assala developed its Supplier Principles of Conduct ("SPC"), which mirror Assala's own Code of Conduct and highlights our expectations of suppliers, vendors and contractors, inclusive of human rights. In particular, this reinforces the expectation that suppliers, vendors and contractors conduct operations and business practices in a manner consistent with the ILO declaration on human rights and labour laws including the elimination of child or forced labour, workplace discrimination, and recognition of freedom of association. The SPC also requires that suppliers conduct their activities in a manner that respects human rights and is consistent with the spirit and intent of the United Nations Guiding Principles on Business and Human Rights.

## Our Policies relating to modern slavery

Assala addresses human rights through the collective of our Code of Conduct, policies and procedures. Our Code of Conduct and our policies continue to provide guidance and all employees, contractors and suppliers working for Assala must adhere to it as well as to all relevant policies. Key policies include:

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

Violations of our Code of Conduct or policies can be grounds for termination of employment or contractual relationships with suppliers.

## Training and raising awareness

Assala requires all staff to complete mandatory training including the annual Code of Conduct training which includes modules covering modern slavery and human rights, anti-harassment, equality, diversity and inclusiveness. As well as annual Code of Conduct training, the organisation will continue to raise awareness on modern slavery through topic specific training, posters and internal communication to our workforce.

## Monitoring and Reporting

We continue to monitor our activities through various methods including employee engagements, supplier business reviews and performance reviews. Our annual ESG report provides an extensive amount of information on Assala's Environmental, Sustainability and Governance (ESG) strategy, including how we integrate the United Nations Sustainable Development Goals related to human rights and modern slavery into our daily activities. It reports on our approach and performance in areas such as labour and employment, health, safety and work conditions.

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## OTHER INITIATIVES

### Speak Up

Through the year, we have continued to raise awareness about our Speak Up campaign through various means including notifications to the organisation, training, screen savers and posters. In 2023, we launched new posters including a poster that sets out the different reporting channels available to the workforce.

### Diversity and inclusiveness

Assala recognises that our strength lies in our diversity. We are committed to ensuring that our workplace is free from bullying and harassment. Through 2023, we continued to progress our 5-year Diversity and Inclusion Strategy, which outlines our approach to improving and increasing diversity in our company. Initiated in 2018, the strategy aims to address 4 key areas – i) underrepresentation of women and young people in technical and leadership roles, ii) potential conscious or unconscious bias or discrimination in the workplace, iii) leveraging the unique perspectives offered by our gender and ethnic diversity and iv) accountability for diversity and inclusion across all areas of our business.

### Staying current

Assala continues to participate in several working groups of Ipieca to monitor business and human rights trends, develop and share practices on human rights management in our supply chain and keep abreast of regulatory developments.

## LOOKING FORWARD

In the coming year, we intend to roll out the SPC to our suppliers and make it a contractual requirement to comply with these principles. Also, we will implement training specifically focusing on human rights and modern slavery on a risk-assessed basis for employees, especially those in procurement, and suppliers. We will continue to update our due diligence processes to ensure these keep pace with relevant changes to human rights related matters and plan to introduce enhanced due diligence human rights questionnaires for suppliers within our supply chain who are identified as having an increased risk for modern slavery.

We will continue to work on improving the identification of modern slavery risk in our business and strive to ensure that awareness mitigation measures are in place across our supply chain as well as within our organisation. We will continue to strive to build on our strong foundations.

## APPROVAL

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

David ROUX

Director / Chief Executive Officer  
April 2024