

Slavery and Human Trafficking Statement



1.0 STATEMENT

This statement is Chrysaor's modern slavery and human trafficking statement made pursuant to section 54(1) of the UK Modern Slavery Act 2015 for the financial year ending 31 December 2019. Chrysaor E&P Limited and each of its subsidiaries are referred to in this statement as **Chrysaor, we** and **our**. This statement is made in respect of and applies to each relevant Chrysaor group company (as set out in section 2.1 below).

We do not tolerate any form of modern slavery or human trafficking in our business or supply chains. This statement sets out the steps that we have taken to identify and prevent, as far as possible, the risk of modern slavery and human trafficking taking place in our business and supply chains.

2.0 ORGANISATION STRUCTURE

2.1 Our Structure

The Chrysaor group currently comprises twenty-four active companies. Chrysaor Holdings Limited (**CHL**) is the ultimate holding company of the group and is incorporated in the Cayman Islands. The penultimate holding company, Chrysaor E&P Limited (incorporated in England and Wales), is an intermediate holding company between CHL and its subsidiaries and, as such, has direct access to the assets and cashflows of the Chrysaor group. This statement applies to Chrysaor E&P Limited and its subsidiaries (as such are detailed in the group structure chart which can be accessed [here](#)).

2.2 Our Business

We are an independent oil and gas exploration and production business operating in the UK and Norway with offices in Aberdeen, London and Oslo. Our portfolio is diversified and balanced in terms of oil and gas production and operated and non-operated assets which span the full field life cycle from exploration through appraisal and development to production. Further details of our portfolio can be found [here](#).

2.3 Our Supply Chains

Our supply chains consist of local, national and international third-party providers of goods and services which support our business and include: manufacturers and distributors of oil field goods and services; providers of operational and technical services; on and offshore facility management services; well engineering and drilling services; and vessel and helicopter logistics, emergency response, human resources, legal, financial, information technology goods and services providers.

3.0 POLICIES

Our Anti-Slavery and Human Trafficking Policy (available [here](#)) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to identify and prevent, as far as possible, the risk of modern slavery and human trafficking from taking place in our business or supply chains.

We expect that our suppliers and other business partners will take all appropriate measures to identify and prevent such risk from taking place in their businesses and supply chains.

4.0 RISK ASSESSMENT AND MANAGEMENT

We consider the risk of modern slavery and human trafficking taking place in our business and supply chains to be low due to the jurisdictions and sector we operate in and as a result of the below noted steps we have taken to manage such risk. We have in place the following controls and systems which assist us in identifying, assessing, managing and preventing such risk:

4.1 Due Diligence, monitoring and engagement

We take a risk-based approach to monitoring our supplier's compliance with all applicable laws, including those relating to modern slavery and human trafficking. When appropriate for assessment or monitoring purposes, or if we have reason to believe that violations are occurring in our supply chains, we will conduct additional assurance by way of assessments and/or audits of our suppliers.

As part of both our screening process for new suppliers and the ongoing management of our existing suppliers,

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we use an industry contractor registration and pre-qualification system (FPAL) and we carry out due diligence checks using a third-party screening service (Thomson Reuters World-Check). Our current systems and processes are enhanced by our supply chain due diligence questionnaire (as detailed further in section 6.0 below) which further assists us in identifying and addressing any risk of modern slavery and human trafficking occurring in our supply chains.

4.2 Contract management

We expect all of our suppliers to act consistently with our Anti-Slavery and Human Trafficking Policy and our related Business Principles (which can be accessed [here](#)). In support of this, our standard form supply chain contracts require our suppliers, in their work for Chrysaor, to respect and comply with our Business Principles and all applicable laws, including those relating to modern slavery and human trafficking. We are prepared to take appropriate action in support of these contractual commitments where a supplier is found not to share and uphold our values and/or comply with all applicable laws, including those relating to modern slavery and human trafficking.

4.3 Speaking up

We encourage a “speak up” culture in which our staff, contractors and suppliers can, through an independent and confidential reporting service, raise any concerns and for these concerns to be listened to and promptly acted upon by our senior management without fear of retaliation.

5.0 TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking occurring in our supply chains and our business, training is available to all employees. This training includes face to face training and advice focused on individuals and functions most likely to face issues related to modern slavery and human trafficking.

6.0 EFFECTIVENESS IN PREVENTING MODERN SLAVERY

We will keep under review the effectiveness of the steps and measures we have taken to identify and prevent, as far as possible, the risk of modern slavery and human trafficking from taking place in our business or supply chains. We understand that this risk is not static and, in the course of the last year, we have further developed our understanding and enhanced our internal training and compliance programmes as follows:

- We have implemented a new due diligence questionnaire that will require to be completed by any new supplier and certain existing strategic suppliers. This has helped strengthen our existing compliance framework through asking specific and targeted questions relating to the supplier’s policies and procedures in relation to the prevention of modern slavery and human trafficking from occurring in their business and supply chains.
- We shall implement a new e-learning module which will help strengthen our organisation’s understanding of, and help us identify and prevent, the risks of modern slavery and human trafficking occurring in our business and supply chains. This e-learning will require to be completed annually by all of our staff.

This statement has been approved by the Board of Directors of Chrysaor E&P Limited on 30 March 2020.

The undersigned is authorised to issue this statement by the Board of Directors of Chrysaor E&P Limited

Phil Kirk
Chief Executive Officer, Chrysaor
30 March 2020