

## Modern Slavery Statement for Financial Year 2020

This Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Seplat Petroleum Development Company plc (“SEPLAT”).

### Introduction

This statement provides an overview of SEPLAT’s policies and approach to slavery, servitude forced labour and human trafficking (together referred to as “Modern Day Slavery”) and is complementary to the Company’s Code of Business Conduct policy. We realise that our business may be exposed to the potential risk of instances of modern slavery and human trafficking given the location and nature of its operations. SEPLAT takes a zero-tolerance approach to Modern Day Slavery and will work to continually assess the extent of this risk and to take steps to ensure that forced labour have no place in the business or its supply chain.

### About SEPLAT

SEPLAT is a leading independent oil and natural gas producer in the Niger Delta area of Nigeria, and a leading supplier of processed natural gas to the domestic market, fully listed on both the Nigerian Stock Exchange and the London Stock Exchange since April 2014.

As a full cycle upstream oil and gas exploration and production company, the Company’s focus is on maximising hydrocarbon production and recovery from existing production and development assets, realising the upside potential within the portfolio through focused appraisal and exploration activities and farm-in into new opportunities in Nigeria.

### Our Supply Chain

We rely on local and international suppliers in our operations. Prior to contract award, we raise awareness amongst our suppliers of our Code of ethical conduct and require Compliance questionnaires to be completed to ensure compliance with international best practices in labour, manufacturing and procurement activities; including a requirement for our suppliers to comply with all applicable anti-slavery and human trafficking laws. Each of our suppliers has its own supply chain and it is recognised that each level is responsible for compliance with applicable laws and for respecting human rights.

### Governance, Policy and Standards

SEPLAT is governed by its Board which guides and approves the Company’s strategy and key policies, reviews financial and management performance. Our Board is committed to ensuring that the principles of good governance and Code of Business Conduct are applied in all our Company’s dealings.

SEPLAT is committed to respecting and protecting human rights wherever we conduct business. SEPLAT’s Code of Business Conduct prohibits the following practices and will not knowingly do business with any individual or company that participates in exploitation of children, including child labour; physical punishment; violence towards employees, specifically when based on gender, origin, religion or sexual orientation; forced or compulsory labour; unlawful discrimination in employment and hiring practices; provision of unsafe working conditions; salary payments (or deductions) that illegally leave the worker below minimum wage; and illegal overtime regulations.

We understand that in our line of business and operations, we establish and interact with suppliers, vendors, agents and third parties who provide us one form of service or the other. These “third parties” may not be subject to any regulation unlike us. It is therefore our duty that we put a mechanism in place to ensure that “third parties” we engage or engaged by SEPLAT, comply with the relevant laws and guidelines applicable to SEPLAT.

### **Controls**

Our goal is not only to ensure the maintenance of our compliance with laws and regulations but also to ensure compliance by our “third parties”. We understand that this is one of the most effective ways of ensuring continuity of business and maintaining integrity of purpose. We have developed the speak-up guidelines with the aim of providing various channels to employees and stakeholders to raise concerns about suspected or actual breaches of our policies and values, as well as other unethical activities and violations of laws and regulations. Our reassurance is that all reports are treated with utmost confidentiality so that such issue or violation is addressed and effectively resolved. We also require all suppliers of goods and services to comply with our Contracting and Procurement principles and ensure compliance by their own suppliers in turn; take special care to comply with standards and procedures in the field of human rights, especially with regard to working conditions for their employees and those of their suppliers and agree to be audited to assess their compliance with these principles for purposes of continuous improvement.

SEPLAT will continue to monitor and manage the risk of servitude to the business in 2021 and will take action to continue to raise awareness of the issue among staff, suppliers, contractors, partners, and others across all our operations. Any reports of instances of Modern Slavery will be investigated, and appropriate remedial action will be taken.

### **Training**

All SEPLAT staff undertake an annual Code Certification process following an online training. We also obtain disclosure from staff about their compliance with the Code and its accompanying standards, procedures, and guidelines.

Our policies and processes will continue to be kept under review and any room for improvement which may be identified will be considered and addressed.

This statement was reviewed and approved by the Board of Seplat Petroleum Development Company plc.

Signed for and on behalf of the Board of Seplat Petroleum Development Company plc.



---

**AMBROSIE BRYANT CHUKWUELOKA ORJIAKO**  
Chairman, Board of Directors