

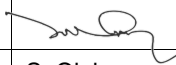

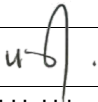
Security Classification: **Restricted**

SEP-LGS-GEN-LS17-00019

CHILD AND FORCED LABOUR POLICY

EXECUTIVE SUMMARY

October 2025

Rev	Date	Description	Issued by	Checked by	Approved by
A02	27-10-2025	Issued for Approval	 S. Ojeh	 R. Brown	 U.U. Udoma

ADDITIONAL APPROVAL / REVISION HISTORY TABLE


Party	Name	Sign	Date

Revision Philosophy

- All documents for review will be issued at R01 as required, with subsequent R02....
- If the document is for information, it will also be issued as A01.
- All revisions Issued for Approval/Implementation will be issued at A01, with subsequent A02, A03, etc. as required.
- All revisions approved for design will be issued at D01, with subsequent D02, D03, etc. as required.
- Documents approved for Construction will be issued at C01, C02, and C03 respectively.
- Documents or drawings revised as "As built" will be issued as Z01, Z02 Z03 etc.
- Narrative sections revised from previous approved issues are to be noted in the table below and/or highlighted in the RH margin (using the appropriate revision status) thus: | A02.
- Previous revision highlighting to be removed at subsequent issues.
- Drawings/diagrams revised from previous approved issues are highlighted by 'clouding' the affected areas and by the use of a triangle containing the revision status.

Revision History

Revision No.	Date of issue	Reason for change
A01	26-01-2023	Issued for Approval
A02	27-10-2025	Issued for Approval

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1. INTRODUCTION

a. Policy Statement

- i. This Policy outlines Seplat Energy’s values on human rights, fundamental freedom, and, adopts the policy to prevent child and forced labour in its operations and those of its business partners.
- ii. The Company firmly believes that the responsibility to engage in employment practices needs to meet the highest legal and ethical standards and is therefore committed to ensuring that it meets these standards.
- iii. The Company adheres to global ESG frameworks and standards, and the primary Nigerian and UK laws and regulations underpinning this Child and Forced Labour Policy (the “**Policy**”) which includes but not limited to: the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the Principles of the United Nations Global Compact, The Child’s Right Act and Nigerian Labour Law.

b. Objectives

The purpose of the Policy is to:

- i. set out Seplat’s approach in preventing the presence of child and forced labour in its operations and supply chain; and
- ii. ensure that Seplat complies with all applicable legal and regulatory requirements against child and forced labour.


c. Applicability

- i. This Policy shall apply to all directors, members of the Seplat Workforce, contractors, vendors, advisers, appointed agents, or persons performing any work/services on behalf of Seplat. This Policy shall also apply to all the business and non-business-related activities over which Seplat has operational control. Where Seplat does not have full operational control, for example, in its non-operated joint ventures, and such non-operated joint ventures’ supply chain, Seplat shall use its influence and best endeavors to align its partners’ approach as closely as possible with the principles set out in this Policy.
- ii. This Policy shall be applied in conjunction with all other relevant Seplat policies, guidelines, processes, and procedures.

2. RELATED DOCUMENTS

This document serves as an Executive Summary of the Child and Forced Labour Policy. For more comprehensive details and guidelines for implementation, please refer to the Main Content of the Child and Forced Labour Policy.

POLICY OWNER: CHIEF EXECUTIVE OFFICER

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CHILD AND FORCED LABOUR POLICY


FULL POLICY (MAIN CONTENT)

OCTOBER 2025

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1. DEFINITIONS

Terms/Acronym	Definition
Board	Board of Directors of Seplat Energy Plc (“SEPLAT”).
CEO	Chief Executive Officer of SEPLAT.
Child Labour	Work or service that results from situations where a person, usually less than 18 years old or not yet of working age, is offered paid or unpaid employment.
Contractors	An individual or business that is hired to do a specific job or task for Seplat on a temporary basis or arrangement.
Director	A member of the Board.
Forced Labour	All work or service which is exacted from any person under the threat of a penalty, harm or otherwise, and for which the person has not offered himself or herself voluntarily.
Hazardous Work	Any work that is dangerous to a child's physical, mental, or moral health. For example, such work exposes children to physical, psychological, or sexual abuse; may be conducted underground, underwater, at dangerous heights, or in confined spaces; may involve dangerous machinery, equipment, and tools. Or which involves the manual handling or transport of heavy loads, etc.
Persons	Refers to one or more members of the SEPLAT Workforce
Vendors	A party in Seplat’s supply chain that makes goods and services available to Seplat.
Workforce	All employees, contract staff, contractor staff, consultants or any other person engaged in the operations of SEPLAT. This Policy refers to these individuals as “Workforce” for simplicity of reference only, and no further meaning shall be implied and construed by such reference
Young Workers	Persons who have reached the minimum age for admission to any type of employment as contained in the Minimum Age Convention of the International Labour Organization and section 59 of the Nigeria Labour Act.


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2. ROLES AND RESPONSIBILITIES

- i. **The Corporate Services Directorate:** The Corporate Services Directorate shall be responsible for the dissemination of this Policy and for ensuring that Seplat’s approach to preventing child and forced labour is embedded across Seplat’s activities and workforce.
- ii. **CEO:** The CEO shall be responsible for ensuring that this Policy is implemented effectively and meets its objectives.
- iii. **The Board:** The Board shall oversee the development and implementation of this Policy, ensuring that it is robust, meets its objectives, and is consistent with applicable child and forced labour legislation.
- iv. **Senior Managers, Team Leads, and Supervisors:** All Senior Managers, Team Leaders, and Supervisors shall be responsible for familiarising themselves with this Policy and ensuring that members of the Workforce, contractors, vendors, and consultants, work within or for their respective departments/units are also familiar with its contents.
- v. **The Director of Corporate Services and GM, Supply Chain:** The Director of Corporate Services and General Manager of Supply Chain Management shall have responsibility for applying this Policy and any related policies and procedures. They will respectively ensure that Seplat vendors, subcontractors, and other entities in Seplat’s supply chain have adequate procedures to prevent child and forced labour in their operations and that their approach to preventing child and forced labour aligns with this Policy.
- vi. **The Internal Audit Department:** The internal audit department shall have the responsibility of monitoring the strict adherence to this policy and providing assurance that the content of the policy is duly considered and implemented.
- vii. **Workforce:** All members of the Workforce shall take personal responsibility for ensuring they are familiar with this Policy and that they comply with it in the performance of their duties.

3. CHILD AND FORCED LABOUR

- i. Seplat shall not partake in or condone the employment or exploitation of any child (defined as any person below the age of 18) in its business operations.
- ii. In locations where the local laws are stricter and impose additional restrictions on the age limit for work over 18 years, Seplat will comply with such laws and regulations.
- iii. In any case Seplat shall not employ any person below 18 years in its workplace.
- iv. If employment is temporary, such as an educational internship, Seplat may, at its sole discretion, consider such educational internship programmes specifically designed for young persons between the ages of 15 and 18 in line with applicable labour laws, regulations, and guidelines.
- v. Seplat prohibits and has zero tolerance for forced labour and any physical punishment, abuse, or involuntary servitude of any worker.

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- vi. Mandatory overtime that is understood to be part of the job description and complies with pertinent laws and regulations is not classified as forced labour.
- vii. In the case of hazardous work, any person under 18 must not be employed.
- viii. Seplat shall require the presentation of valid identification issued by an official authority or any federal or state-recognized legal documentation for proof of age before employment.
- ix. Where an applicant's physical appearance is inconsistent with the documents presented, Seplat shall request documentation from a reputable and accredited third party to validate such person's age.
- x. Proof of age documentation must be kept on file for all Persons.

4. EMPLOYMENT OF YOUNG PERSONS

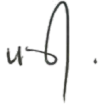
- i. Young workers, for example, interns (defined as persons between the ages of 15 and 18) must possess adequate legal documentation to work.
- ii. Young workers must not perform physically strenuous work or work that involves hazardous materials.
- iii. Young workers may not perform any dangerous activity that jeopardizes their physical, mental, or psychological well-being or impairs their intellectual, moral and social development.
- iv. Young workers may not, under any circumstance, work overtime or be assigned to night shifts.
- v. Seplat will request proof of implementation of prevention measures of this principle from its prospective and existing business partners, contractors, vendors, and third party(-ies) carrying out work on behalf of Seplat.
- vi. Seplat shall require adherence to these principles from its suppliers, contractors, agents and service providers.
- vii. Seplat shall not fund or engage in business that violates any of the above principles.
- viii. Seplat shall have an effective grievance procedure to allow any child and forced labour issues that arise to be reported and resolved. **A copy of the grievance procedure is included in Appendix B.**

5. UPDATES TO THE POLICY

This Policy will be updated every three years or sooner if required by changes in the Company's business or relevant laws and regulations. All updates will be promptly communicated to relevant departments and units. This policy covers key areas selected by the organisation, and additional policies and procedures may be added in the future.

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This policy has been approved by the following authorised individuals:

Name	Title	Signature	Date
Roger Brown	Chief Executive Officer		
Udoma Udo Udoma	Board Chairman		

Contact Information

For any questions or clarifications regarding this policy, please contact:

- **Department:** Human Resources | Legal & Company Secretariat
- **Title:** Director, Corporate Services | Director, Legal
- **Email:** HR@seplatenergy.com Seplatlegal@seplatenergy.com