



Child and Forced Labour Policy

Seplat Energy plc (Seplat) is the foremost independent indigenous Energy Company in Nigeria. Our overriding priority is to ensure compliance with applicable regulations and best practice. To this end, Seplat strongly values the cause of human rights and fundamental freedom. Seplat commits to respect, promote, and prevent child and forced labour in its operations, and use its best endeavors to ensure that its business partners do so.

This Commitment includes compliance to the regulations and guiding principles applicable to our operations. The rights are preserved in the International Labour Organisation's (ILO) 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 etc.

This Policy provides the basis of Seplat's approach to Child and Forced Labour in its operations and is further reinforced by Seplat's Code of Business Conduct and other relevant policies.

Principles

Seplat will achieve these objectives by ensuring that:

- Seplat does 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.
- 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. In any case Seplat shall not employ any person below 18 years in its workplace.
- No person under 18 years shall be employed to undertake any work designated as hazardous.
- 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 years and 18 years in line with applicable labour laws, regulations, and guidelines.

- There is express prohibition and zero tolerance for forced labour and any physical punishment, abuse, or involuntary servitude of any worker.
- There is presentation of valid identification issued by an official authority or any federal or state-recognized legal documentation, as proof of age before employment.
- Proof of age shall be properly documented for all employees. 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.

Application and Responsibility

The CEO shall be responsible for ensuring that this Policy is implemented effectively.

This Policy applies to all directors, employees, 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 we are not the operator, we will seek to influence our joint venture participants so that the joint operation adopts commitments similar to those of this Policy.

This Policy will be reviewed regularly and updated as required.