

## Serica Energy

# Slavery and Human Trafficking Statement

Serica Energy plc (“**Serica Energy**”) is a British-based independent upstream oil and gas company with operations centred on the UK North Sea where we have a full range of exploration, development and production assets. More information can be found here: [www.serica-energy.com](http://www.serica-energy.com)

This slavery and human trafficking statement has been prepared by Serica Energy on behalf of itself and its subsidiaries, including Serica Energy UK Limited and Tailwind Energy Investments Ltd (“**Tailwind Energy**”).

In March 2023, Serica Energy completed the acquisition of Tailwind Energy and its subsidiaries. This statement covers the activities throughout the financial year 2022 (ending 31 December 2022) of both Serica Energy (and its subsidiaries) and (separately) Tailwind Energy (and its subsidiaries).

The statement describes the steps each of Serica Energy and Tailwind Energy have taken during the 2022 financial year to ensure slavery and human trafficking is not taking place:

- (i) in its supply chains; or
- (ii) in its own business.

It was approved by Serica Energy’s Board of Directors on 18 August 2023.

**Mitch Flegg**  
**Chief Executive Officer**  
**Serica Energy plc**  
**18 August 2023**

## 1. Serica Energy

This section sets out the steps Serica Energy took in 2022 in respect of avoiding slavery and human trafficking.

### **RISK ASSESSMENT AND APPROACH**

Serica Energy considers the risk of modern slavery and human trafficking taking place in its business and supply chains to be relatively low due to the jurisdictions and sector in which it operates. Nonetheless, Serica Energy does not tolerate modern slavery in its business and expects its service providers, suppliers, vendors and business partners to maintain equally high standards in their respective organisations and supply chains.

### **SUPPLY CHAIN MANAGEMENT**

#### **1. Pre-contract checks**

Serica Energy uses “SEQual” in its operations procurement process for suppliers and contractors. This platform is used extensively in the oil and gas sector to provide companies with assurance that there is no slavery or human trafficking in their supply chains. “SEQual” provides assessments covering Corporate and Social Responsibility and requires each such potential supplier or contractor to confirm the measures taken to ensure there is no slavery or human trafficking in its organisation or supply chain. More information can be found here: <https://sequal.co.uk/>

#### **2. Contract terms**

Serica Energy’s supply chain contract terms for its operated assets require high standards of business ethics, compliance with applicable laws, commitment to safeguarding health and safety and protection of the environment. Such terms require that each such supplier (i) does not engage in or benefit from modern slavery, including slave labour and human trafficking, (ii) provides its personnel with adequate training and (iii) carries out checks on its supply chain to protect against modern slavery.

#### **3. Audit**

Serica Energy has the contractual right to request an audit on each of its supplier’s policies, procedures and records to verify compliance with the contractual obligations set out above.

During 2022, Serica Energy completed its transition from FPAL to SEQual and updated its processes to enhance scrutiny on suppliers in respect of modern slavery compliance. This enhanced scrutiny includes Serica exercising its audit right to request and review suppliers' modern slavery compliance processes.

## **INTERNAL GOVERNANCE**

Serica Energy has the following processes in place to safeguard against slavery and human trafficking in its own business.

### **1. Training**

Serica Energy requires all staff (including direct contractors) to successfully complete compliance training, which covers anti-modern slavery, on a regular basis.

### **2. Whistleblowing Policy**

Serica Energy encourages a “speak up” culture. In 2021 the Board signed off the Whistleblowing Policy which provides a mechanism for reporting, investigating and remedying wrongdoing. The company takes reports of wrongdoing extremely seriously, including any concerns related to slavery and human trafficking. Any such concerns will be listened to and, if necessary, promptly acted upon without fear of retaliation through an independent and confidential reporting service.

More information can be found here:

<https://www.serica-energy.com/downloads/policies/Whistleblowing-Policy.pdf>

### **3. Code of Business Conduct**

All staff (including direct contractors) are required to follow Serica Energy's Code of Business Conduct, which was refreshed in 2022 as a comprehensive mandatory e-Learning module. Recognising the changing dynamics around the risk of modern slavery and human trafficking (and compliance matters generally), Serica Energy frequently reviews and (if necessary) updates its Code of Business Conduct, which contains provisions in respect of anti-slavery and human trafficking.

## **ESG AND UN COMMITMENT**

Serica Energy has signed up to the UN Global Compact and is committed to its Ten Principles on human rights, labour, environment, and anti-corruption. More information can be found [here](#) and our letter of commitment is [here](#).

Serica Energy have also published an ESG Report which can be found [here](#).

## 2. Tailwind Energy

This section sets out the steps Tailwind Energy took in 2022 in respect of avoiding slavery and human trafficking.

### **POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Tailwind Energy is committed to preventing modern slavery or human trafficking in its supply chains or in any part of its business. Its Code of Conduct reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking taking place as far as possible.

### **SUPPLY CHAIN AND DUE DILIGENCE**

Tailwind Energy takes a risk-based approach to safeguarding against modern slavery taking place within its business or supply chain. Due to the nature of its business, Tailwind Energy evaluates the risk of slavery and human trafficking within its business and supply chain in general to be low. Nevertheless, it has screening processes in place to ensure the risk is managed in relation to the relevant circumstances.

Tailwind Energy follows enhanced due diligence processes, using third party screening services on all of its suppliers above a minimum value threshold or risk profile. Tailwind Energy also verifies that its joint venture partners and key suppliers are doing a similar level of due diligence. Where any queries arise from the due diligence, Tailwind Energy review these together with its joint venture partners and key suppliers and together determine the most appropriate action to take to prevent slavery or human trafficking, or any other issues.

Tailwind Energy include specific modern slavery compliance clauses in its contracts with suppliers, in addition to requiring suppliers to adhere to applicable laws.

### **SUPPLIER ADHERENCE TO VALUES**

Tailwind Energy has zero tolerance to slavery and human trafficking. Tailwind Energy requires all those in its supply chain and contractors to comply with its values.

### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in Tailwind Energy's supply chains and business, Tailwind Energy provides annual training to staff and key contractors.

## **EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Tailwind Energy review annually how effective it has been to ensure that slavery and human trafficking is not taking place in any part of its business or supply chains. Tailwind Energy will continue to monitor compliance with its policies and remain alert to identification of any new risks.