

Neptune E&P UK Limited Slavery and Human Trafficking Statement

Introduction

This statement has been published pursuant to the Modern Slavery Act 2015 (the "Act"). It highlights the steps taken by Neptune E&P UK Limited ("Neptune") to mitigate the risks of slavery and human trafficking existing in its business and direct supply chains.

Neptune maintains a strong culture of ethics and human rights standards. Respect for others, integrity in business, and a code of behaviour which emphasises fairness, honesty, and compliance with legislation and regulations – these are the principles by which Neptune ensures that its ethics and human rights standards are upheld and maintained.

Our Organisation

Neptune is an affiliate of Neptune Energy Group Holdings Limited. Neptune is the operator of the Cygnus field in the Southern North Sea with a reputation for safe, responsible exploration and production.

Through the implementation of its Code of Ethics and Business Integrity and other ethics related policies, Neptune maintains a strong culture of ethics and human rights standards. Respect for others, integrity in business, and a code of behaviour which emphasises fairness, honesty, and compliance with legislation and regulations – these are the principles by which Neptune ensures that its ethics and human rights standards are upheld and maintained.

As an operator, Neptune engages its suppliers and service providers to implement Neptune's operations in accordance with Neptune's direction and supervision. As such, Neptune expects its suppliers and service providers to comply with Neptune's company policies and procedures (including its Code of Ethics and Business Integrity and related policies) in all respects, in the same manner as it expects its own employees to comply with the same.

Evaluation of Risk of Slavery and Human Trafficking

As an upstream oil and gas operator in the North Sea, Neptune has evaluated its risk in terms of the existence of slavery and human trafficking in its business and supply chain and believes that its risk is low based on the following factors:

- Supply Chain Management
- Compliance with Applicable Laws
- Training
- Policies and Procedures
- Contractual Obligations
- Local Suppliers

Supply Chain

Neptune's Supply Chain plays a key role in the tendering of contracts, due diligence of tenderers, the award of a contract to Neptune's selected supplier or service provider, and the management of that contract.

Throughout the contract life cycle, Neptune's Supply Chain utilises Achilles FPAL to monitor the HSE, Quality, Competence and Corporate Social Responsibility performance of current and potential suppliers. Neptune undertakes due diligence exercises and audits as far as reasonably practical to ensure that suppliers and service providers are fully compliant with the principles and standards required and upheld by Neptune.

Neptune strives to award high performing contracts that meet all of its contractual and commercial requirements. It aims to maintain open and transparent dialogue with suppliers and service providers, through the development of effective Relationship and Contract Performance Management Plans. These plans allow for critical relationships to be fostered and for Neptune to be fully engaged in the activities of its key suppliers and service providers.

Neptune is also a signatory to the Oil and Gas UK Supply Chain Code of Practice (SCCoP). The SCCoP sets out best practice guidelines for the UKCS and works with purchasers and suppliers to reach the highest attainable standards of business ethics, health, safety and environmental operations, in accordance with all statutory, local and national legislative requirements.

Compliance with Applicable Laws

Our employees, as well as suppliers, service providers and their personnel, are obliged by their contracts with Neptune to comply with all laws, regulations, statutes and any other requirements of the UK or of international authorities with jurisdiction over Neptune. Such obligations are reinforced by means of Neptune's company policies and procedures.

Training

Awareness of applicable legislation, policies and procedures is controlled by mandatory training which all employees and specified personnel of suppliers and service providers must complete and record. Neptune believes that this minimises the risk of contravention of UK and applicable international legislation.

Policies & Procedures

As mentioned above, Neptune maintains strict policies and procedures in respect of ethics and human rights. These policies and procedures mirror our legal obligations as a company and as individuals and are integral to Neptune's culture of ethics and human rights standards.

Effectiveness in Preventing Slavery and Human Trafficking

Neptune believes that the nature of Neptune's industry and operations in the territory in which Neptune conducts business, is in itself a mitigating factor. However Neptune's commitment to compliance with laws, regulation of its employees, suppliers and service providers and adherence to Neptune's strict company policies, ensures that Neptune's obligations under the Act are met.

Signed



Ian Conacher

Country Director, Neptune E&P UK Limited

Dated: 14th February 2018