



Neptune Energy Slavery and Human Trafficking Statement

(for the financial year ending 31st December 2018)

Introduction

This Slavery and Human Trafficking Statement relates to the financial year ending on 31st December 2018, and is published by Neptune Energy Group Limited and its subsidiaries (collectively "Neptune Energy") in compliance with the UK Modern Slavery Act.

Neptune Energy is an independent oil and gas exploration and production company with a regional focus on the North Sea, North Africa and South East Asia. Neptune Energy's aim is to build an E&P company with material scale, operating capability and options for ultimate value realisation.

Our Organisation

Through the implementation of its Code of Ethics and Business Integrity and other ethics related policies, Neptune Energy maintains a strong culture of ethics and human rights standards. Respect for others, establishing a culture of integrity, behaving fairly and honestly, and acting in accordance with law and regulations — these are the principles by which Neptune Energy ensures that its ethics and human rights standards are upheld and maintained. In addition, Neptune Energy encourages its employees to speak up if they are concerned about any illegal or corrupt behavior in the activities of Neptune Energy, or any actions that are, or could be, harmful to Neptune Energy's activities, operations or reputation.

Neptune Energy works with a wide range of suppliers of goods and services, both in the UK and internationally, and considers such suppliers to be key stakeholders in Neptune Energy's value chain. Neptune Energy requires such suppliers and subcontractors to comply with Neptune Energy's ethics and compliance principles, in the same manner as it expects its own employees to comply with the same.

Compliance with Neptune Energy's ethics and compliance principles forms an integral part of those operations.

Evaluation of Risk of Slavery and Human Trafficking

Neptune Energy has evaluated its risk in terms of the existence of slavery and human trafficking in its business 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 Energy's Supply Chain function plays a key role in the tendering of contracts, due diligence of tenderers, the award of a contract to Neptune Energy's selected supplier or service provider, and the management of that contract.

Throughout the contract life cycle, Neptune Energy's Supply Chain uses Achilles FPAL to monitor the HSE, Quality, Competence and Corporate Social Responsibility performance of current and potential suppliers. Neptune Energy 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 Energy.

Neptune Energy 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 Energy to be fully engaged in the activities of its key suppliers and service providers.

In the UK, 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 Energy to comply with all laws, regulations, statutes and any other requirements of the UK or of international authorities with jurisdiction over Neptune Energy. Such obligations are reinforced by means of Neptune Energy'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 Energy believes that this minimizes the risk of contravention of UK and applicable international legislation.

Policies and Procedures

As mentioned above, Neptune Energy 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 Energy's culture of ethics and human rights standards.

Effectiveness in Preventing Slavery and Human Trafficking

Neptune Energy believes that the nature of Neptune Energy's industry and operations in the territories in which Neptune Energy conducts business are in themselves mitigating factors. However, Neptune Energy's commitment to compliance with laws, regulation of its employees, supplier and service providers and adherence to Neptune Energy's strict company policies, ensures that Neptune Energy's obligations under the Act are met.

Signed: 

William Samuel Hugh Laidlaw
Executive Chairman Neptune Energy

This statement has been approved by the Board of Directors of Neptune Energy Group Limited on 27th March 2019 and by the directors of each of its relevant subsidiaries, in compliance with the UK Modern Slavery Act.