



## **Statement under the UK Modern Slavery Act for financial year ending 31 December 2023 (“Statement”)**

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the approach which ONE-Dyas UK Limited, ONE-Dyas E&P Limited and their affiliates (together “ONE-Dyas”, or “we”) have taken to understand potential modern slavery risks related to our business and the actions undertaken to mitigate any such risks during the financial year ending 31 December 2023.

### **Values and policies**

ONE-Dyas recognises its responsibility to respect human rights in all aspects of doing business and have embedded human rights in our values, Code of Conduct, Health, Safety and Environmental (HSE) policy, Speak Up policy and Supply Chain Management policy. A comprehensive Environment, Social and Governance (ESG) strategy and action plan were started in 2020 which resulted in the identification of material ESG topics for ONE-Dyas. As part of this process, employee well-being and impact on local communities were identified as areas of importance and focus.

In 2023, ONE-Dyas kicked-off efforts to align the organisation with the requirements of the EU Corporate Reporting Sustainability Directive (“CSRD”) and the European Sustainability Reporting Standards (“ESRS”). To ensure CSRD readiness, a gap assessment was conducted in respect to the data, processes, controls, and governance relating to material sustainability and social topics for ONE-Dyas.

Further preparations were made in 2023 to carry out a Double Materiality Assessment, identifying the material impacts (positive and negative), risks, and opportunities in relation to topics such as promoting responsible and transparent labour practices within own operations and the supply chain, security of employment and fair wages, equal treatment and opportunities for employees, prevention of child and forced labour, employee outreach and community engagement. This process to further assess and (re)confirm the relevance of these (sub) topics to the ONE-Dyas ESG strategy and future sustainability reporting.

Adding to that, in 2022, ONE-Dyas developed a Supply Chain ESG policy, with a goal to further embed environmental, social, and governance criteria and principles in supply chain due diligence and decisions including risk assessments, contractor and supplier screening, procurement processes and tender evaluations. Five key principles govern the ONE-Dyas Supply Chain action plan which was rolled out in 2023 for further implementation in 2024: awareness of ESG objectives, transparency and traceability of supplied services, collaboration with suppliers to ensure adoption of responsible practices, integration across all relevant procurement practices, and measurement of progress and impact.

Our internal policies cover, amongst others, freedom of association and the effective recognition of the right to collective bargaining and the prohibition of forced or compulsory labour. Next to that, our policies include principles to ensure that our ethics and human rights standards are upheld. This includes that we will seek to provide a working environment that is free from harassment and disrespectful conduct, that we will not use child labour, that we provide equal opportunities and do not discriminate with regards to gender, race, religion, age, disability, nationality, social or ethnic origin. We have reviewed and updated our policies in 2023. We believe that an integrated approach to human rights, by embedding it into our policies, business systems and processes, allows us to manage human rights effectively within our existing ways of working. Our policies apply to all our employees and contractors.

## **Business and supply chain**

ONE-Dyas is active in the full life cycle of upstream oil and gas. The business takes place predominantly in the United Kingdom, The Netherlands as well as Germany.

For the purpose of providing this Statement, we made a distinction between operated and non-operated assets, as set out below.

### *Operated assets*

For our operated assets we manage the exploration, appraisal, development and production of crude oil, natural gas and natural gas liquids. In some instances, we also market and transport these hydrocarbons. This includes engaging suppliers and contractors to operate and maintain our on- and offshore facilities and includes purchasing equipment. The ONE-Dyas team aims to develop and strengthen relationships with contractors and suppliers. Each of our contractors and suppliers has its own supply chain and we recognise that each level in the supply chain is responsible for ensuring compliance with all applicable laws and regulations and for respecting human rights.

We recognise that also ONE-Dyas has a role to take. This Statement predominantly describes how our procurement team approaches modern slavery risks in the supply of goods and services for our operated assets as we believe this to be an area that poses higher labour rights risk, and our focus, for the purpose of this Statement, is on our direct suppliers.

### *Non-operated assets*

For our non-operated assets, the operatorship is assigned to one of the other joint venture partners. These joint ventures, and particularly the operators, must comply with legislation and are encouraged to apply materially equivalent business principles in their operations as the principles that we apply in our own organisation and for the assets operated by us. When contracting with a third party, we encourage and monitor where possible the operator of the asset to follow guidelines that are in line with our previously mentioned values and policies.

## **Risk assessment**

Certain areas of our supply chain may pose a higher HSE and labour rights risk due to their location and the nature of the goods and services procured. Our risk assessment is a combination of both country (predominantly UK, The Netherlands and Germany) and category risk. With respect to equipment, we carefully consider the origin of products to be bought. As part of our procurement processes and to identify and mitigate risks, we use specific tools to assess, qualify, evaluate and monitor suppliers. Depending on the potential risk levels, suppliers are required to have a higher registration status in order to become eligible to minimise risk of non-compliance.

## **Due diligence**

We recognize the role of due diligence in bringing our commitments to life. In accordance with our Supply Chain Management and Supply Chain ESG policies, contractors and suppliers are assessed prior to awarding a contract. We use external screening tools to support our due diligence processes. We may also carry out on-site audits. Next to that we also consider termination of a contract if serious or persistent shortcomings are found.

In our contract templates for procurement, suppliers and contractors agree to comply with applicable laws and regulations and there is specific focus on providing and maintaining safe and healthy working conditions for all supplier personnel.

### **Effectiveness and performance management**

Through our supplier selection and qualification process, contractors and suppliers may be subject to on-site audits, which could be announced or unannounced, and which may be performed by either our own personnel or third-party auditors. These audits help us to verify if suppliers and service providers are compliant to the principles and standards required. We also perform review and feedback sessions on a project basis where we actively consider topics like HSE, ESG, quality and competence.

Allegations or concerns that are raised with us will be investigated and may result in suppliers being required to develop corrective action plans, backed up by on-site audits. We have inhouse specialists who investigate concerns or allegations about a breach of our policies or Code of Conduct. If a violation is confirmed, we take appropriate action up to and including contract termination or dismissal. We maintain a stringent, no-retaliation policy to protect any person making a good faith allegation.

In addition, we endeavour to conduct formal and informal exchanges with supplier groups to increase awareness on HSE, ESG, and labour rights topics, communicate our expectations, work to jointly identify any gaps and improvement opportunities and promote best practices.

### **Training**

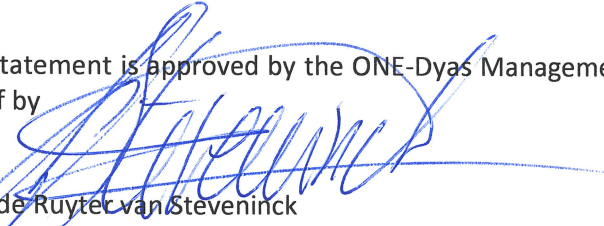
All our staff are made aware of our Code of Conduct and associated Ethics and Compliance policies. A selection of staff, with specific exposure to certain risks or areas, received more in-depth training on compliance related topics. Training participation is documented, repetition cycles are clearly defined and follow-up is automated. Both our Code of Conduct, company policies and related employee guidance documents are available on our intranet.

### **Declaration**

At ONE-Dyas we are committed to continually improve the quality of our operations. The long-term success of our business is reliant on our ability to ensure the health, safety and well-being of our employees, contractors and the public, as well as minimising our impact on the environment. ONE-Dyas therefore requires compliance with the laws and regulations applicable to our business.

We have assessed the ONE-Dyas business and supply chain, our values, policies and the implemented processes with respect to our operated and non-operated assets. We concluded that there is a relative low risk of slavery and human trafficking in the ONE-Dyas business, mainly due to the fact that we are predominantly active in The North Sea. However, we are fully committed to preventing slavery and human trafficking in our activities and supply chain.

This Statement is approved by the ONE-Dyas Management Board on 27 May 2024 and signed on its behalf by



Chris de Ruyter van Steveninck  
CEO ONE-Dyas