

Harbour Energy plc

# Modern Slavery and Human Trafficking Statement 2024



**#WeAreHarbourEnergy**





## About this statement

This statement relates to the financial year ending 31 December 2024. It is published by Harbour Energy plc and its relevant subsidiaries<sup>1</sup> in compliance with the UK Modern Slavery Act 2015. The statement describes our ongoing efforts to prevent modern slavery in our business and supply chain. All data is provided on a reported basis with the Wintershall Dea asset portfolio contributing from completion of the transaction (3 September 2024) unless otherwise stated.



For more information about our:



**Code of Conduct, please visit:**  
<https://www.harbourenergy.com/about-us/our-values-code-of-conduct/>



**2024 Annual Report, please visit:**  
<https://www.harbourenergy.com/ar-report-2024>

**Business Partner Code of Conduct, please visit:**  
<https://www.harbourenergy.com/about-us/our-policies/>

1. The relevant subsidiaries for the purpose of this statement are Chrysaor Limited, Chrysaor North Sea Limited, Chrysaor Petroleum Company U.K. Limited, Chrysaor Production (U.K.) Limited, Chrysaor (U.K.) Sigma Limited, Harbour Energy Marketing Limited and Premier Oil UK Limited.

## CONTENTS

2 ABOUT HARBOUR ENERGY	3 OUR POLICIES	4 KEY PERFORMANCE INDICATORS
2 OUR SUPPLY CHAIN	3 DUE DILIGENCE AND RISK ASSESSMENT	4 NEXT STEPS
2 KEY ACTIONS IN 2024	4 TRAINING	4 CONFIRMATION STATEMENT







Harbour is one of the world’s largest and most geographically diverse independent oil and gas companies and employs more than 3,000 employees and almost 400 direct contract staff globally.

In September 2024, Harbour completed the acquisition of the Wintershall Dea asset portfolio – transforming the scale and longevity of our portfolio and extending our global footprint to 11 countries. We have material positions in Norway, the UK, Germany, Argentina, Mexico and North Africa. We also have a leading CO<sub>2</sub> storage position in Europe. We plan to conduct a detailed human rights risk assessment across our expanded portfolio in 2025.

OUR SUPPLY CHAIN

Our suppliers include local, national and international businesses that supply goods and services to our organisation. We have approximately 3,400 suppliers, many of whom engage sub-contractors to provide goods or perform services for us. Our suppliers include those that provide support services to offshore and onshore facilities, such as security, logistics, catering, cleaning and waste management services; as well as specialist technical services, such as engineering and drilling services.

Our supply chain team are responsible for managing the supply chain, including for the tendering of contracts, award of contracts and successful execution of those contracts.

Harbour jointly owns some assets as a partner in joint ventures with third parties. Where we are the operator in a joint venture, we have a greater influence over the management of the operations, including the protection of labour rights and prevention of modern slavery.

In joint venture operations where we are not the operator, we expect the operator to have in place the necessary processes and procedures for mitigating the risk potential human rights violations within their business and supply chain and to take steps to ensure that they comply with all applicable laws and regulations.

Key actions in 2024

Supplier due diligence

We embedded a new third-party risk management tool which assesses and screens suppliers before they are onboarded and monitors them through the lifecycle of our relationship with them. Screening and monitoring identify relevant risks that a supplier could present to Harbour including the potential for a human rights, modern slavery and/or worker welfare violation within our supply chain.

Following the Wintershall Dea transaction, we commenced a review of the human rights and worker welfare screening platforms used across the company to share learnings and good practice on supplier due diligence.

Compliance review

We implemented recommendations from an independent third-party review of our compliance programme in the UK, including compliance with the Harbour Energy Policies (see page 3), carried out in 2023. The third-party also carried out a first-time review of our compliance programme in our Indonesia Business Unit. We plan to implement recommendations from this review in 2025.

Promoting a speak up culture

We improved the visibility and accessibility of our whistleblowing hotline. Employees and people working with us can report concerns via Safecall, an independent company, which operates 24 hours a day, seven days a week.

Assessing our human rights risks

We commissioned an independent review of our human rights, social and corruption risks, including potential exposure to forced labour and worker welfare violations across our expanded global portfolio. The review found that 28 per cent of assets are deemed to have high risk<sup>1</sup> exposure to human rights-related risks. We will use the findings to further develop our human rights action plan, taking a risk-prioritised approach.

1. As defined by Verisk Maplecroft’s suite of human rights-related indices.





# OUR POLICIES

Harbour is committed to respecting human rights (as set out in the United Nations Universal Declaration of Human Rights) by preventing modern slavery in our supply chain and to upholding worker welfare standards (as defined by the ILO Core Labour Standards) throughout our operations and we expect our suppliers to do the same.

Our commitment and expectations with respect to modern slavery and worker welfare are set out in our Code of Conduct and our supplier codes of conduct, which set out the behaviours and standards expected of those working with or on behalf of Harbour Energy. They reflect our commitment to uphold the highest standards of business conduct including zero tolerance for any form of modern slavery in any form anywhere including forced labour, child labour or human trafficking.

These are supported by other Harbour processes which form part of our wider ethics and compliance framework including:

- Contractor Due Diligence Standard
- Diversity, Equity and Inclusion Policy
- Health, Safety, Environment and Security Policy
- Human Rights Statement
- Occupational Health and Welfare Standard
- People Policy
- Supply Chain Contracting and Procurement Procedure
- Supply Chain Contracting and Procurement Standard
- Supply Chain Policy
- Sustainability Policy
- Whistleblowing Procedure

(together the Harbour Energy Policies). The Harbour Energy Policies apply to all Harbour Energy directors, officers, employees and contractors.

## Speak up



We expect our employees and contractors to speak up if they identify or hear about any instance of human rights, modern slavery or worker welfare violation in our operations or our supply chain. We have zero tolerance for retaliation against anyone who raises a concern in good faith and any threat or intimidation will result in disciplinary action.

We expect our suppliers to have equivalent speak up mechanisms available to workers in their supply chain and are continuing to work with them to ensure that is the case.

# DUE DILIGENCE AND SUPPLIER MANAGEMENT

We take a risk-based approach to assessing and identifying compliance risks in our supply chain and across our business, including in relation to human rights, modern slavery and worker welfare risk, and have the following controls and systems in place:



## Screening and monitoring suppliers

Our Contractor Due Diligence Standard requires all new contracting entities to be screened and each contract to be risk-assessed based on value and activity. Once we complete the screening and onboard the supplier, we monitor them for the duration of the contract.

For medium and high-risk suppliers, we supplement the initial screening with a follow-up questionnaire, requiring the supplier to provide specific information regarding their compliance programme, including human rights policies, and we seek confirmation in relation to any historic human rights violations.

Where we identify any specific concerns in relation to human rights, modern slavery or worker welfare risks, we take appropriate action, including enhanced due diligence, mitigations and the possible discontinuation of our engagement with a supplier.

In 2024, we conducted an onsite audit of a key contractor in Malaysia to identify potential human rights impacts. This was led by an independent human rights organisation which interviewed representatives from the contractor company and its sub-contractors. The audit found that the contractor had strong systems to manage employment conditions. It also identified areas for improvement related to sub-contractor working hours and recruitment processes. We will work with the contractor in 2025 to monitor progress against agreed remedial actions.



## Contracts

Our contract templates and Harbour Energy Policies are updated periodically to reflect any changes to applicable laws and regulations, including in respect of modern slavery. Our contract templates include the right for us to terminate a contract where a supplier has:

- Engaged or continues to engage in improper conduct that would breach their obligations to us in relation to applicable laws, including modern slavery and worker welfare;
- Failed to comply with the principles and standards of our values and our supplier codes of conduct; or
- Violated its own code of conduct.

This right is included across all templates, including purchase order terms and conditions, which represent the majority of our contracts. In circumstances where we believe that our suppliers have not met our expectations or their contractual obligations, we will take appropriate action.



## Risk assessments for new operating locations and partnerships

We also have processes in place to risk assess new country entries and new partnerships. As part of this, we carry out risk assessments (including an assessment of human rights considerations, where relevant) and third-party due diligence investigations through reputable and established service providers.

In 2024, we carried out human rights risk assessments in a number of our Business Units. We are reviewing the results of these assessments, which will inform the development of a human rights roadmap in 2025, with risk prioritised actions.



# TRAINING

Each year we launch mandatory training on our Code of Conduct. In 2024, 96 per cent<sup>1</sup> of employees and direct contract staff completed the training and all new employees and direct contractors received induction training on the Code.

Relevant employees are trained on human rights, modern slavery and worker welfare risks.

We conducted training covering human rights in some of our Business Units in 2024. This included training on human rights and worker welfare aspects specific to the oil and gas sector, as well as on general principles for conducting human rights due diligence.

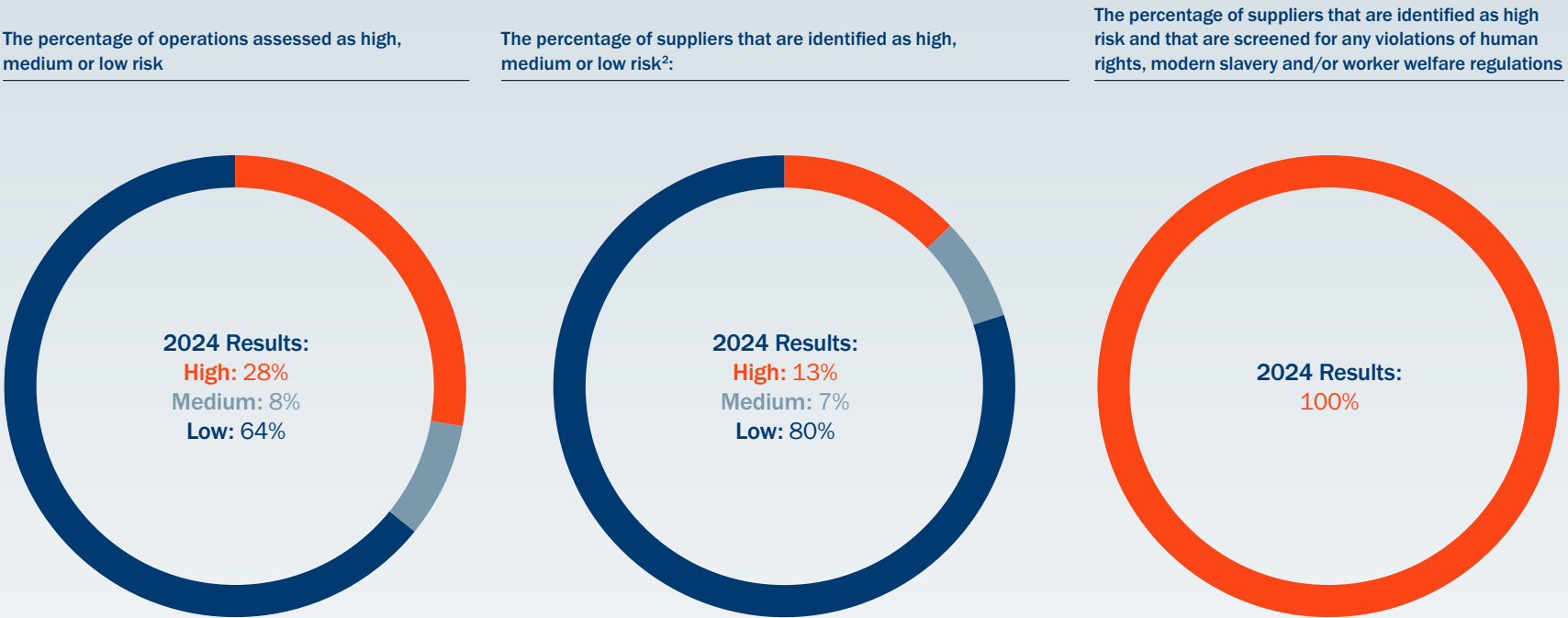


In 2025, we plan to hold compliance days in each of our Business Units that will include topics relating to modern slavery and worker welfare.

1. This excludes the Germany Business Unit due to works council restrictions.

# KPIs

Our KPIs for measuring our effectiveness in identifying the potential for human rights, modern slavery and worker welfare violations are:



We also track additional indicators, such as the number of substantiated allegations of wrongdoing as set out in our Code of Conduct, our performance in closing whistleblowing reports, and reported violations of our Slavery and Human Trafficking Statement. These metrics are published on our website.

2. This includes suppliers for Harbour's legacy business. We plan to extend measurement of this metric in 2025 to our expanded portfolio following the Wintershall Dea acquisition in 2024.

# NEXT STEPS

We review the steps we take to identify and prevent the risk of modern slavery taking place in our business and supply chain regularly. We recognise our work in this area will continue to evolve.

Following the Wintershall Dea transaction, we are reviewing the processes and practices for managing human rights risks in our legacy entities. Learnings from this review will inform the development of our human rights roadmap in 2025, which will include actions related to worker welfare and preventing modern slavery. We also plan to:

- Engage with relevant suppliers to ensure that they have effective speak up mechanisms for raising concerns when working for us.
- Train and raise awareness of our relevant employees and contractors, including embedding our third-party risk management tool.
- Evaluate compliance with modern slavery and worker welfare practices during site visits to suppliers' premises, where appropriate.
- Enhance our processes to identify, assess and manage the risk of modern slavery in our supply chain by developing a standard for business partner due diligence.
- Commission an independent review of human rights risks in our business and supply chain and review our human rights due diligence processes in preparation for the EU's Corporate Sustainability Due Diligence Directive.

**Confirmation statement**  
This statement has been approved by the Harbour Energy plc Board and each of its relevant subsidiaries, in compliance with the UK Modern Slavery Act 2015.

**Linda Z. Cook**  
Chief Executive Officer, 5 March 2025



**Registered Office**

Harbour Energy plc  
4th Floor  
Saltire Court  
20 Castle Terrace  
Edinburgh  
EH1 2EN  
Registered No. SC234781

**Head Office**

Harbour Energy plc  
151 Buckingham Palace Road  
London  
SW1W 9SZ  
Tel: +44 (0)20 7730 1111

**Further reading**



[HARBOURENERGY.COM](https://www.harbourenergy.com)



[CODE OF CONDUCT](#)



[2024 ANNUAL REPORT  
& ACCOUNTS](#)



**#WeAreHarbourEnergy**

Designed and produced by three thirty studio  
[www.threethirty.studio](http://www.threethirty.studio)