



## **ENGIE 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 ENGIE E&P UK Limited ("ENGIE") to mitigate the risks of slavery and human trafficking existing in its business and direct supply chains.

ENGIE 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 ENGIE ensures that its ethics and human rights standards are upheld and maintained.

### **Our Organisation**

ENGIE is an affiliate of the world's largest utilities company and an established E&P company with interests on the UK Continental Shelf (UKCS). ENGIE 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 Ethics Charter and other ethics related policies, ENGIE 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 ENGIE ensures that its ethics and human rights standards are upheld and maintained.

As an operator, ENGIE engages its suppliers and service providers to implement ENGIE's operations in accordance with ENGIE's direction and supervision. As such, ENGIE expects its suppliers and service providers to comply with ENGIE's company policies and procedures (including its Ethics Charter 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, ENGIE 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**

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

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

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



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

#### Policies & Procedures

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

#### **Effectiveness in Preventing Slavery and Human Trafficking**

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

Signed



**Ruud Zoon**

**Managing Director, ENGIE E&P UK Limited**

Dated: 6<sup>th</sup> January 2017

