



## **Section 54 – Modern Slavery and Human Trafficking Statement**

### **Introduction**

CNOOC supports the elimination of all forms of modern slavery. Key to our culture of integrity is our commitment to the requirements of the Modern Slavery Act 2015 (the “Act”) and taking all reasonable steps to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business. Effective human rights due diligence and supply chain management are extremely important to us\*.

### **CNOOC business and supply chains**

In the UK, CNOOC is an active participant of the upstream sector of the oil and gas industry, focussing on the production of hydrocarbons. CNOOC's primary contracting entity for its operations in the United Kingdom Continental Shelf is CNOOC Petroleum Europe Limited (“CPEL”). As holder of both operated and non-operated interests, we recognise that the requirements of the Act are especially relevant to the supply chain of CPEL. CPEL's Supply Chain Management function sits within the Business Services & Technology division and covers Contracts, Procurement, Logistics and Material Management and spans the entire lifecycle of upstream hydrocarbon activities.

### **CNOOC policies**

Our suppliers are partners in our business success and as such, it is important they have the same commitment to ethics, integrity and sustainable business practices as we do. We will not work with suppliers who do not demonstrate a commitment to the requirements of the Act. In order to ensure alignment, we are committed to providing our current and prospective suppliers with the appropriate resources and tools to enable them to work ethically, responsibly and safely. These tools include our Supplier Policies comprising, among other policies, our Compliance Manual for Entities and Employees, all of which are available on our website. These set expectations of how we do business within the supply chain, reinforcing adherence to our corporate values and company policies. Our suppliers are expected to conduct their operations in a responsible manner, respecting the rights of the individuals they employ. This includes following appropriate hiring practices, adhering to applicable labour laws and ensuring that all employees are treated with dignity, respect and fairness. We expect our suppliers to support and respect human rights and avoid complicity in human rights abuses. There is an express contractual undertaking in all of our contracts for suppliers to comply with our policies and procedures. Furthermore, in 2022 we commissioned a project for all our main contract templates to be reviewed by an external law firm to ensure full compliance with all laws, including the full requirements of the Act.



### **CNOOC due diligence processes**

We are a member of the International Petroleum Industry Environmental Conservation Association (“IPIECA”), the global oil and gas industry association for environmental and social issues. IPIECA has engaged with very experienced risk management supply chain consultants, Verisk Maplecroft, and a selection of operators and suppliers to develop a comprehensive Modern Slavery supplier questionnaire which we in turn considered to develop our own more focussed questionnaire to supplement our existing supplier qualification processes. Current supplier qualification processes include the use of a new North Sea Industry supplier system called SEQual, which qualifies, evaluates and monitors suppliers. CNOOC is working with SEQual to enhance the supplier registration process and find ways of standardising our human rights due diligence and assessment processes to make our approach more efficient and consistent as an industry. In 2023, we completed a gap analysis between our current Modern Slavery supplier questionnaire and the new Modern Slavery and Human Trafficking question set introduced by SEQual as part of their supplier compliance requirements. This exercise concluded that the questionnaires were largely aligned however the CNOOC version is more robust and will continue to be issued as part of our tender package. Responses to the questionnaires will be evaluated by Legal on a pass/fail basis.

### **CNOOC risk assessment and management**

To ensure our obligations in terms of managing Modern Slavery in our supply chain are met on an ongoing basis, all of our supply chain standard contract templates include an obligation on our counterparties to comply with the Act and outline appropriate termination regime for non-compliance. Our tender documentation includes the aforementioned supplier questionnaire to assist with our due diligence and risk evaluation. When reviewing tenders from high-risk suppliers, we assess whether bidders can comply with our work policies and standards before proceeding to the commercial evaluation stage of the tendering process. The Contract Award Process and the accompanying Contract Management System Workflow Approval Process allow various stakeholders within the business to review draft contracts and ensure they incorporate required standards and give effect to the Act.

In order to build on the steps taken at the supplier qualification stage, including completion of our Modern Slavery supplier questionnaire and associated assessment, in 2024 we will engage with our key suppliers, and suppliers identified as higher risk to ask these suppliers to present an annual update on their organisations’ management of modern slavery risk and demonstrate how Modern Slavery is eradicated from their supply chain. These presentations will be provided as part of business performance reviews and copies shall be retained for reference and learning. This process will be completed on annual basis to enable us to monitor



whether our suppliers meet our expectations and continue to comply with our policies and promotes collaboration on best practice. We will continue to support cross-industry learning and risk management approaches.

**CNOOC commitment to ensuring that slavery and human trafficking is not taking place in our business or supply chains**

We also monitor the impact of our operations in the communities where we work. To reinforce our commitment in this area, we encourage our employees to speak up if they see behaviour that violates human rights. We engage openly and honestly in the communities where we operate respecting universal human rights and the rights of aboriginal and indigenous people. We communicate our commitment to social responsibility through candid, timely and public disclosure of our Health, Safety, Security, and Environment Statements, which form part of our Supplier Policies.

**CNOOC staff training**

Since 2015, we have introduced numerous measures to address the regime and continue to ensure compliance with the Act. As part of our on-boarding process for supply chain professionals we include Modern Slavery Act training aimed at reinforcing the need for due diligence as part of the contracting process. We are committed to use the knowledge and dedication of our staff, internal contractors and our suppliers to make sure that we progress and improve how we work to ensure compliance within our organisation.

Yiyong Pan

Managing Director, UK  
For and on behalf of CNOOC UK Limited  
Date of signature: 10 July 2024

A handwritten signature in black ink, appearing to read "Yiyong Pan", written over a thin horizontal line.

This statement has been approved of 20 June 2024 by board resolutions of CNOOC UK Limited, CNOOC Petroleum Europe Limited, CNOOC Petroleum Farragon U.K. Limited, CNOOC Etrick U.K. Limited and CNOOC Petroleum Mauritania Limited in compliance with the Modern Slavery Act 2015 for financial year ending 31 December 2023.

\* References to "us" and "we" in this statement refer to CNOOC UK Limited on behalf of itself and all of its subsidiaries in the UK including CNOOC Petroleum Europe Limited

