



**MODERN SLAVERY  
&  
HUMAN TRAFFICKING POLICY**

# SAHARA GROUP MODERN SLAVERY & HUMAN TRAFFICKING POLICY

## 1 Introduction

Sahara Group and/or its affiliates (the “Company”) is wholly committed to bringing energy to life responsibly and encouraging our partners and suppliers to do the same. In pursuit of this objective, the humane treatment of persons in our employment and supply chains is of paramount importance. It is our belief that slavery in all forms and human trafficking are a violation of fundamental human rights and therefore repugnant to the laws of natural justice, equity and good conscience. As an organization, we collectively take a stance against slavery and human trafficking and will not tolerate it in our operations or supply chains.

Our staff will play a key role in anti-slavery and anti-human trafficking initiatives and our contractors and suppliers will be encouraged to do likewise. This will be achieved by incorporating anti-slavery and anti-human trafficking checks in our due diligence process.

## 2 Purpose

The purpose of this policy is to set out, for members of staff, clients, partners, and governments of the jurisdictions in which we operate, our corporate stance on modern slavery and human trafficking. This policy ties firmly to the Company’s vision of “**Being the Provider of Choice Wherever Energy is Consumed**” and supports the Company’s focus on sustainability of humanity and the environment.

## 3 Definition of terms

- 3.1 **Human Trafficking** – Facilitating the travel of another person for/towards their exploitation.
- 3.2 **Slavery/Modern Slavery** – Any act by which a human being or corporate entity exercises powers of ownership over another human being.

## 4 Scope

This policy applies to all employees of Sahara Group and its affiliates, collectively referred to as “Sahara Group” or the “Company”. It also extends to the entirety of majority-owned business interests in countries in which the Company operates. Where the Company has only a minority interest, the application of this policy amongst business partners including contractors and suppliers will be encouraged. The policy operates in conjunction with the Company’s ethical standards as stated in the Code of Conduct and Business Principles as well as the reporting procedure provided for in the Company’s Whistleblowing Policy.

## 5 Responsibilities & Raising Concern

Although this document specifically refers to modern slavery and human trafficking, it equally applies to any forms of infringement on a person's fundamental human rights. It is expected that members of staff at all levels, will lead by example, in ensuring adherence to this policy and the reporting procedure.

In keeping with this expectation, everyone at Sahara Group has a responsibility to:

- 5.1 **Speak up** if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services against their will. You are expected to follow our whistleblowing reporting procedure (Deloitte Tip-Offs Anonymous) as contained in the Company's Whistleblowing Policy. The Company's "Whistle blowing" policy gives further guidance on how to raise concerns and it gives detail about the support and safeguards that are available to those that do raise concerns.
- 5.2 **Follow our reporting procedure** if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated.
- 5.3 **Make suggestions**, if you think there is more, we can do to prevent people from being exploited.

## 6 Our procedure

- 6.1 We make a clear statement on our position on Modern Slavery and Human Trafficking, that we take our responsibilities to our employees, partners people working within our supply chain seriously.
- 6.2 We check our supply chain through our supplier due diligence process to reduce the potential for slavery and human trafficking.
- 6.3 For industries considered high risk, our significant supplier contracts should contain a clause against Modern Slavery and Human Trafficking. This clause will ask suppliers and their employees to commit not to engage in slavery or human trafficking and encourage them to conduct diligence their own supply chain.

## **7 Actions the Company will take**

- 7.1 All reported and escalated concerns will be treated in confidence and will be investigated promptly and fully in a professional manner. It should be noted however, that an allegation is not an automatic indictment of the individual or entity against whom the allegation is made. As such, they will not be deemed to be guilty of any wrongdoing, until the case is investigated and proven.
- 7.2 Where a report or an allegation of slavery or human trafficking is made, the Company will:
  - 7.2.1 Investigate the allegations thoroughly or refer the case to the appropriate law enforcement agency.
  - 7.2.2 Take appropriate disciplinary action where it involves an employee in line with the Company Sanctions Grid.
  - 7.2.3 Where appropriate, the results of any action taken, including prosecutions will be reported via the appropriate media.
- 7.3 To ensure that the investigation process is not abused, raising malicious or vexatious allegations, will be dealt with as a disciplinary matter.

## **8 Monitoring**

We will review our Modern Slavery and Human Trafficking Policy regularly and commit to providing updates and training (where required) on any changes we make.

**This Policy Applies to All Members of the Board, CEO/other Members of the Senior Executive Management Team and All Staff of the Company.**