

# Modern Slavery & Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Energean plc ("Energean" or the "Company").

## Introduction

Modern slavery is a heinous crime and a morally reprehensible act that deprives a person's liberty and dignity for another person's gain. It is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

At Energean, we have a zero-tolerance approach to modern slavery and are fully committed to preventing slavery and human trafficking in our business and supply chain. During the financial year 2023, we have taken concrete steps to understand all potential modern slavery risks related to our business, and to implement steps to tackle modern slavery, as outlined in our statement.

#### About Energean

Energean (LSE:ENOG, FTSE 250, TASE אנאג, TA-35) is a London Premium Listed FTSE 250 and Tel Aviv Listed TA-35 E&P company with operations in eight countries across the Mediterranean and UK North Sea. Further details on our portfolio and the countries where we operate can be found on our website <u>https://www.energean.com/operations/</u>.

We establish a relationship of trust and integrity with all our suppliers, which is built upon mutually beneficial factors. Our supplier selection and on-boarding procedure includes due diligence of the supplier's integrity and reputation, respect for the law, compliance with health, safety and environmental standards, and references.

#### **Governance, Policy and Standards**

Energean has in place a Code of Ethics, a Human Rights policy and a whistleblowing policy for identifying and detecting slavery and human trafficking risks in our operations.

Whistleblowing Policy - we encourage all employees, contract personnel and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistle-blowers.

Energean new Code of Ethics encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Contractual provisions: We keep up to date all standard services contracts to include key contractual provisions that seek to ensure that our suppliers and contractors comply with the international laws on human rights, modern slavery and human trafficking and preserve our auditing rights to these respects.

### Value Chain due diligence

A key component of our systematic and risk-based approach revolves around the implementation of due diligence. We distribute questionnaires to suppliers and request performance data with regards to health and safety, environmental and natural resource management, business ethics, human rights including child labour/forced labour and in general labour standards. As a further step we aim to extend the supplier audit programme we do have in place for high and medium risk contracts, to address risks related to human rights and labour conditions.

#### Awareness

Energean has raised awareness of modern slavery issues by putting up posters on Intranet accessible by all our staff, which explains:

- Our commitment in the fight against modern slavery
- Red flags for potential cases of slavery or human trafficking
- How employees should report suspicions of modern slavery

#### Training

In addition to the Code of Ethics training, Energean assigns to all key employees an e-learning course which covers:

- Various forms of modern slavery in which people can be held and exploited.
- The size of the problem and the risk to our organisation.
- How employees can identify the signs of slavery and human trafficking and should respond if they suspect slavery or human trafficking.
- What external help is available for the victims of slavery.
- An attestation from employees that they will abide by Energean anti-slavery policy.

# Next steps

In 2024, Energean will continue to emphasize to our suppliers and staff our commitment to ensuring that modern slavery and human trafficking is not part of our business practices.

This statement was reviewed and approved by the Board of Energean plc at the board meeting on 22 May 2024. Signed by Mathios Rigas, CEO, on behalf of the Board of Energean plc.

Mathios Rigas Chief Executive Officer -Director Energean plc May 2024