



## United Kingdom Modern Slavery Act Transparency Statement

### **Introduction**

The *United Kingdom Modern Slavery Act 2015* requires certain businesses to publish a statement setting out the steps that they have taken to ensure that there is no modern slavery in their own business and their supply chains. The term “modern slavery” includes a wide variety of behavior such as slavery, servitude and forced or compulsory labour and human trafficking.

The purpose of the legislation is to allow the public to understand and compare the steps that different organisations have taken to do their part in the fight against modern slavery.

At RAK Petroleum plc (“RAK Petroleum” or the “Company”), we conduct our business with integrity, respecting the laws, cultures, dignity and rights of individuals in all countries where we operate.

### **Our Business, Structure and Supply Chains**

RAK Petroleum is an Oslo Børs - listed oil and gas investment company whose fundamental objective is to generate significant total shareholder returns from investments in the oil and gas industry, with a focus on the Middle East, Africa and North Sea Regions.

The Company currently holds interests in two oil and gas companies (the “Investment Entities”): DNO ASA (“DNO”) and Foxtrot International LDC (“Foxtrot International”). At 31 December 2018, the Company indirectly owned 40.45 percent of the total outstanding shares of DNO (including treasury shares) and indirectly owned 33.33 percent of Foxtrot International.

Founded in 1971 and listed on the Oslo Børs since 1981, DNO is a Norwegian exploration and production company focused on the Middle East and the North Sea with interests in oil and gas blocks in various stages of exploration, development and production, both onshore and offshore.

Foxtrot International is a privately-held company active in West Africa whose principal asset is a 27.27 percent interest in and operatorship of Block CI-27 offshore Côte d'Ivoire. Block CI-27 contains the two largest producing gas fields in the country, meeting three-quarters of Côte d'Ivoire's needs.

RAK Petroleum’s business involves the management of its investments in the Investment Entities with a small staff and minimal footprint. The Company and its wholly-owned subsidiaries have no direct production or expenditure in oil and gas assets. All production and expenditure in oil and gas assets is

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carried out through the Investment Entities, DNO and Foxtrot International. Given the nature of our business, we consider the risk of involvement in modern slavery in our business to be low.

Further details of our business are set out in our 2017 Annual Report and Accounts and 2018 Half-Year Financial Report, which are available on our website.

### **Our Policies**

RAK Petroleum's business operations and supply chains are relatively simple: we do not have any direct production or expenditure in oil and gas assets and do not obtain material services from third parties and are not ourselves involved in the manufacture or supply of physical products.

The majority of service providers that we use are professional services firms including recognised accounting and legal firms.

We have a small number of staff whose welfare we take extremely seriously. The Company is committed to promoting respect and fairness for individuals in the workplace.

RAK Petroleum has adopted an Anti-Corruption Manual (the "**Anti-Corruption Manual**") which provides that we are committed to operate in accordance with ethical, responsible and sound business principles and to comply with all applicable laws and regulations. Further, it provides that RAK Petroleum employees must take reasonable steps to ensure that RAK Petroleum's business partners do not engage in corrupt activities or other illegal or unethical activities. These steps should include sufficient due diligence to establish that the services are legitimate, that the business partner is qualified to perform the services, that the level of remuneration is commensurate to the value of the services and that there are no other "red flags" regarding the integrity of the business partner. RAK Petroleum employees who suspect that a business partner is involved in corrupt activities must report and seek advice on the matter in accordance with the reporting procedures set out in the Anti-Corruption Manual.

The Anti-Corruption Manual applies to all employees and RAK Petroleum's business partners, including contractors and suppliers, who are also expected to comply with the principles outlined in the Anti-Corruption Manual when dealing with or acting on behalf of the Company.

Each of the Company's Investment Entities has robust compliance policies that promote the wellbeing of their staff and contractors which the Company has reason to believe are being implemented and followed.

To the Company's knowledge, after enquiry, DNO and Foxtrot International are not aware of and have not been accused of, any incidents of modern slavery in their operations.

## **Steps taken to ensure that modern slavery is not taking place in our business or supply chains**

While we consider the risk of modern slavery in our business to be low, we have decided to take further steps to ensure that modern slavery is not occurring in our business, including:

- Adopting an Anti-Slavery and Human Trafficking Policy which sets out our zero-tolerance policy regarding modern slavery.
- Conducting a risk-based approach to our contracting processes and keeping these under review, including an assessment of whether contracts with third parties should include specific prohibitions against the use of modern slavery and assessing the merits of writing to suppliers requiring them to comply with our Anti-Slavery and Trafficking Policy.
- Informing staff of our policy on modern slavery and human trafficking.
- Continuing to appropriately evaluate and modify policies and procedures to maintain accountability and mitigate risks for RAK Petroleum and third parties.

This statement was approved by the Board of Directors of RAK Petroleum on 12 April 2019 for the financial year ended 31 December 2018.



Kevin J. Toner  
Managing Director and General Counsel