

UNITED OIL & GAS

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT



UNITED
OIL & GAS

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 31 December 2021.

Introduction

United Oil & Gas plc ("United", the "Company") and its subsidiaries (together the "Group") is committed to the requirements of the Act and to taking all reasonable steps to ensure modern slavery and human trafficking are not taking place in its supply chain or in any part of its business. This statement sets out the steps that United has taken, and is continuing to take, to ensure no modern slavery or human trafficking occurs within its supply chains or business

United recognises that modern slavery is a significant global human rights issue and can take many forms, including human trafficking, forced labour, child labour, domestic servitude, people trafficking, workplace abuse and/or other unethical behaviour. United is committed to acting ethically, and with integrity and transparency, in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery within United's business or supply chains. United has a zero-tolerance approach to modern slavery and requires its supply chains to comply with this commitment. United is also committed to respecting internationally recognised human rights, including fundamental labour rights and international labour standards as set out in the Universal Declaration of Human Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work

Our Structure

United Energy plc is a public company incorporated under the laws of England and Wales and listed on the Alternative Investment Market of the London Stock Exchange under trading code "UOG". It is the ultimate parent company of the United group of companies which currently consists of seven subsidiary companies as at 15 February 2022.

Our business

United is an independent, UK-domiciled oil and gas exploration, development and production company with assets in Egypt, UK, and Jamaica.

The Company's headquarters are in Dublin, Ireland. There is a small regional office in Egypt. There are a total of 10 employees across Dublin, London and Cairo. Further information regarding United's business can be found at www.uogplc.com.

Our supply chains

Our supply chain consists of local, national and international third-party providers of goods and services. In relation to supply chain contracts for joint venture operations where we are not the operator, we contractually require our operating partners to comply with all applicable laws and regulations.

United only engages reputable firms, vendors and consultants.

The potential risk of modern slavery affecting United's supply chains is dependent on the type and level of activity being carried out in each country. Risks of modern slavery within our operations and business were assessed having regard to the following key criteria:

- country of location: modern slavery has a higher prevalence in certain jurisdictions or locations
- industry sector: certain industries present higher risks of modern slavery compared to others
- product/commodity: some products or commodities are deemed higher risk in terms of modern slavery

We consider that there is a low risk of modern slavery and human trafficking taking place in our business and supply chains. This is mainly due to the sector in which we operate and because most of our suppliers are both staffed with skilled workers and technical specialists.

Our policies on slavery and human trafficking

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business such as Anti-corruption and bribery Policy ; Diversity and Inclusion Policy; Human Rights Policy; Whistleblowing Policy and Corporate Responsibility Policy. We continuously review and update all our policies. Our Code of Ethics and Business Conduct, and related policies (the “United policies”) reflect United’s commitment to prevent modern slavery and human trafficking from taking place in either our business or supply chains. We expect our suppliers and other business partners to act consistently with the United policies and to take all appropriate measures to identify and prevent modern slavery and human trafficking from taking place in their businesses and supply chains. Any unethical behaviour or non-compliance with the United policies, including human rights grievances, can be reported to us through our management channels.

United’s system of standards, policies, procedures and guidelines ensures that the risks associated with social and governance aspects of its operations are managed comprehensively. Those policies include the Code of Ethics and Business Conduct (the “Code”) which is focused on maintaining positive relationships with all stakeholders, including business partners, suppliers and the wider communities in which United works. The Code promotes working within the applicable laws of the countries in which United operates, promoting high ethical standards and a culture whereby people are empowered to report issues of concern. Further, United has Human rights guidelines and policy and Whistleblowing policy which, amongst other things, focuses on conformance with applicable laws and social and ethical criteria and empowers employees to alert the Company of any non-compliance issues. Through integrated planning and decision-making, United identifies and prioritises such risks. Depending on the nature of the risks, these are either managed by local business units or at the corporate level. Employees are required to report any concerns regarding modern slavery and/or human trafficking in our business or supply chains. Our policies encourage a culture of openness so that employees are able to raise concerns in good faith without fear of reprisals. We address failures by our employees to adhere to our policies, and this may involve disciplinary action, up to and including dismissal for misconduct or gross misconduct. Similarly, if a supplier or other organisation fails to act consistently with our expectations or their contractual obligations this may result in termination of contract. The business has clear and effective governance structures in place that are supported by policies, standards, procedures and guidelines, including in respect of modern slavery and human trafficking risk and prevention. The Code, and all of the United policies, on our website at <https://www.uogplc.com/responsibility/working-responsibly/>

Risk assessment and management

Due diligence processes for slavery and human trafficking

United conducts due diligence on potential suppliers before engaging with them to ensure that they comply with United’s policies and have not previously been convicted of offences. United carries out due diligence in relation to ensuring slavery and/or human trafficking does not take place within its organisation or supply chains, including conducting a review of the controls of its suppliers. United has taken the following steps to ensure that modern slavery is not taking place within its business, operations and supply chains:

- Identify and assess potential risk areas in our supply chains
- Monitor potential risk areas in our supply chains
- Review supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;
- Review supplier policies to ensure that they are up to date and relevant;
- Ensuring staff are aware of United’s zero tolerance policy toward modern slavery; and
- Protect whistle blowers
- In the event that modern slavery is exhibited by, or suspected by United of originating from, a supplier:
- the supplier will be immediately suspended as an approved supplier;
- further investigations will be carried out in respect of the supplier to determine whether the suspicion has merit;

- if the suspicion is found to have merit, the supplier will be immediately removed from United's approved supplier list and the local authorities informed to enable them to take the necessary steps, including commencing an investigation and/or prosecution, in accordance with applicable law;
- any customer or supplier found to be in breach of the Act or applicable modern slavery legislation will have its contract with United cancelled; and
- United will take follow up action to ensure appropriate remedial steps are taken in respect of those impacted by the supplier's practices

Supplier adherence to our values and ethics

United expects its suppliers to adhere to and act in a manner consistent with United's Code of Ethics and Business Conduct and other policies, including in respect of modern slavery and human trafficking. This is supported by contractual obligations on suppliers to comply with legal requirements relating to modern slavery and human trafficking. United is prepared to take appropriate action to ensure that its suppliers comply with those legal and contractual obligations.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all United staff are required to read United's Code of Ethics and Business Conduct and related policies. Regular training is provided as necessary. If any employee is in doubt whether a particular act or working condition contravenes any aspect of the policies, they are encouraged to seek guidance from a line manager.

Our effectiveness in combating slavery and human trafficking

At the time of providing this statement, United is not aware of any current or recent incident of forced or involuntary labour or human trafficking in relation to United's supply chains or business. Supply chain risk assessments are undertaken, and no issues have been identified during the onboarding process or scheduled audits and reviews during the financial year ending 31 December 2021. This statement will be reviewed each financial year. Following the review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, United intends to take the following further steps during the coming financial years to prevent slavery and human trafficking:

- continue to risk assess its supply chains and undertake due diligence on its suppliers in relation to compliance with the Act;
- continue to review the effectiveness of the steps and measures it has taken to identify and prevent the risk of modern slavery and human trafficking within its business activities
- emphasise to its suppliers United's commitment to ensuring that modern slavery and human trafficking are not part of its supply chains.

The statement is available on the company website, will be communicated within the organisation, and will be supplied to interested parties upon request.

Approval for this statement

This statement was reviewed and approved by the Board of Directors of United Energy plc July 2022.

On behalf of the Board of Directors of United Oil and Gas plc



Brian Larkin
Chief Executive Officer
July 2022