### **Modern Slavery Statement**

Dana Petroleum Limited is the parent company of the Dana Petroleum group ("Dana"). This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and constitutes Dana's slavery and human trafficking statement ("Modern Slavery Statement") for the year ending 31 December 2023. This Modern Slavery Statement has been adopted by Dana Petroleum (E&P) Limited.

The Act creates offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("Modern Slavery"). The board and management of Dana has a zero-tolerance approach to Modern Slavery and are committed to combatting all forms of Modern Slavery and human trafficking within its group, including in our supply chain.

#### **About Dana**

Dana is an oil and gas exploration, development and production company with group operations (including joint ventures) in the UK, the Netherlands and Egypt. Dana is headquartered in the UK. Further information can be found here.

## Steps taken to prevent Modern Slavery

During 2023, Dana continued to take steps not only to ensure compliance with the Act but also to ensure that we conducted our business in an ethical and responsible manner. This 2023 Modern Slavery Statement documents the key steps Dana has put in place to reduce the risk of Modern Slavery affecting its business and supply chain.

# Policies and Procedures (Code of Conduct)

In 2023 Dana consolidated and enhanced existing policies and launched a new Code of Conduct ("Code") which underpins how we do business. This Code helps us when making day to day decisions on behalf of Dana and to help us "Do the Right Thing". It is a central part of our commitment to conducting all our business to the very highest ethical standards. The Code makes it clear that Dana does business in a manner that respects the human rights and dignity of all and that we are committed to combatting all forms of Modern Slavery.

Our Code promotes working within the laws and regulations of the countries in which we operate, in order to meet high ethical standards and foster a culture whereby people are empowered to report issues of concern. Dana chooses to work with business partners that share their commitment to their

Values of Safety, Respect and Integrity. The Code applies to everyone at Dana regardless of where they work, and we expect and encourage all our contractors and their employees to act in a way that is consistent with our Code. The Code is available in our core languages of English, Arabic, Dutch and Korean.

## **Supply Chain**

Dana favours having suppliers who are registered with an industry recognised supplier verification scheme such as Achilles which identifies, evaluates and provides pre-qualification information about suppliers on behalf of major buyers in oil and gas and request that suppliers complete a corporate social responsibility questionnaire answering questions that relate specifically to Modern Slavery within their organisation. The answers to these questions are then fed back to Dana for review. Dana have compiled their own Compliance Checklists for suppliers not registered with an industry recognised supplier verification scheme to ensure appropriate due diligence is completed prior to contracting with a supplier.

#### **Procurement**

Dana aims to procure products and services from high quality and high integrity suppliers. We achieve this through our procurement processes which require that a Supply Chain Management representative is involved from the initiation of procurement through to the award of contract. This includes carrying out appropriate risk checks with a third party provider. The third party provider is instructed to complete a search in relation to each potential supplier against drivers of third party risk such as Modern Slavery. Goods and services of higher risk and monetary value are subject to more involved tendering processes. Consideration of quality management systems, policies and related information is a part of this process.

#### **Contractual Terms**

Dana requires that all suppliers comply with all applicable laws which encompasses not only full compliance with the Act but other matters such as anti-bribery and corruption, GDPR and tax evasion.

### **Reporting Concerns**

Dana is committed to conducting its business in a fair, honest and transparent manner. Dana encourages all employees to "speak up" and raise any behaviours which may conflict with our Code by using our independent third party phone line which offers assistance in our core languages of English, Arabic, Dutch and Korean or by registering the concerns online using a Dana specific QR code.

On 23<sup>rd</sup> June 2023 Dana promoted World Whistleblowing Day by sending a communication to all

employees and contractors to encourage colleagues to "Do the Right Thing" and "Speak Up". Dana will

not tolerate retaliation against any individual who, in good faith, raises concerns about behaviour which

may conflict with our Code.

**Risk Assessment** 

Dana has in place a Modern Slavery risk assessment to identify and assess potential risks within our

business and in our supply chain relating to Modern Slavery and Human Trafficking. As part of this

risk assessment process, Dana audits our joint venture partners to ensure that they comply with the

same high standards as Dana does. This risk assessment is kept under regular review to ensure it is

up to date, with our latest review being completed in April 2023.

**Training** 

In conjunction with the launch of the new Code, Dana launched online training to all employees in all

locations which includes an individual module specifically on Modern Slavery and Human Trafficking.

This training ensures all employees and contractors have an understanding and awareness around

Modern Slavery and Human Trafficking and the provisions of the Act.

At the time of writing, Dana is not aware of any current or recent incidents, nor accusations of

forced/involuntary labour or human trafficking in our operations or those of our business partners.

This statement was approved by the board of Dana on 6th March 2024.

Jaegu Nam
Jaegu Nam (Mar 6, 2024 15:00 GMT)

Signed by Jaegu Nam

Director for and on behalf of Dana Petroleum Limited