

## MAERSK OIL NORTH SEA UK LIMITED

### MODERN SLAVERY STATEMENT for 2017

*This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 and constitutes Maersk Oil North Sea UK Limited's ("Maersk Oil") anti-slavery and anti-human trafficking statement for the financial year ending 31 December 2017. This statement should be regarded as complimentary to the A.P. Møller – Maersk Sustainability Report, which can be found at - <https://www.maersk.com/en/business/sustainability/sustainability-reports-and-publications/reports>*

#### Introduction

During 2017, Maersk Oil was ultimately wholly owned by A.P. Møller Maersk A/S, an integrated transport and logistics company with multiple brands, and a global leader in container shipping and ports. Including a stand-alone Energy division, A.P. Møller – Maersk employed roughly 88,000 employees across 130 countries.

Maersk Oil strives to conduct business in a responsible and upright manner. We are committed to good and fair labour conditions in our operations and supply chain. We refrain from practices that can give rise to risks of forced or involuntary labour, human trafficking and other practices defined as “modern slavery” in the A.P. Møller – Maersk Global Labour Principles and [Third Party Code of Conduct](#).

#### *Acquisition by Total –*

In Q1 2018, Maersk Oil was acquired by Total SA (“**Total**”), a top tier international energy company with worldwide exploration, production, processing and marketing activities employing more than 98,000 people across in excess of 130 countries. Total’s shares are listed and publicly tradeable on the Euronext Paris Stock Exchange and the New York Stock Exchange.

Total requires high professional standards of behaviour in all its business dealings and has implemented a range of policies, guides and training to ensure these high standards are met. In Total’s [Human Rights Guide](#) the CEO of Total, Patrick Pouyanné, sets out human rights as one of Total’s three priority business principles,

*‘Respect for Human Rights in the workplace for our employees and promotion of these principles in our supply chain, in particular by preventing child and forced labor, avoiding discrimination, observing workers’ rights and by respecting freedom of expression.’*

This statement sets out the steps taken by Maersk Oil to ensure that there was no slavery or human trafficking in its own business and to require suppliers took the same approach in the supply chain.

This statement relates to actions and activities undertaken during the financial year ending 31 December 2017.

## **Implementing our Commitment**

Maersk Oil, implemented its commitment to eradicate modern slavery in 2017 by means of policies, supply chain due diligence and risk assessment, and training.

### *1. Policies*

#### *Global Labour Principles –*

All employees were covered by a single set of Global Labour Principles, designed to protect their rights and safety.

The Global Labour Principles framework was implemented across A.P. Møller – Maersk with the aim of furthering constructive and productive labour relations with employees and their representatives, ensuring that labour relations and labour conditions served the interests of both the employees and the company.

The Head of A.P. Møller – Maersk Human Resources was responsible for monitoring the implementation of, and compliance with, the Global Labour Principles. Progress was reported by the A.P. Møller – Maersk Global Labour Relations Council to the Head of A.P. Møller – Maersk Human Resources.

#### *Third Party Code of Conduct –*

A.P. Møller – Maersk Third party Code of Conduct (the “**Code**”) described what we considered to be appropriate business conduct by suppliers, third party agents and contractors and it was implemented through the Responsible Procurement Programme.

The Code set out expectations concerning responsible business behaviour in the areas of health and safety, equal opportunity rights, compensation and working hours , child labour and forced or involuntary labour, freedom of association, anti-corruption and environment.

The CEO’s of the businesses and Head of Maersk Procurement were responsible for integrating the Responsible Procurement Programme into existing procurement policies and processes in the supplier relations they respectively owned or managed. A.P. Møller – Maersk Sustainability Council was responsible for endorsing the direction and measuring the progress on implementation of the Responsible Procurement Programme.

## *Whistleblower System –*

We take seriously any allegations that human rights are not respected in our operations or business relations. Allegations can be reported without fear of retaliation by any person within our outside A.P. Møller – Maersk. In 2017 this could have been done through A.P. Møller – Maersk’s [Whistleblower System](#) available worldwide on more than 75 languages. It enabled reporting of a wide scope of human rights concerns, including human trafficking and forced or involuntary labour, child labour, and actions harming persons, their livelihood or properties, related to our operations, suppliers, contractors, third-party agents, and other business partners with a direct link to A.P. Møller – Maersk.

## *2. Due Diligence in our Supply Chain & Supplier Risk Assessment*

Managing our supply chain risks is of special importance due to less direct oversight and control of their working conditions and recruiting practices. Since 2010, A.P. Møller – Maersk’s [Responsible Procurement Programme](#) aimed at integrating sustainability into A.P. Møller – Maersk’s purchasing processes by measuring and ensuring compliance with the social and environmental standards contained in the A.P. Møller – Maersk Third Party Code of Conduct. Furthermore, we strived to ensure that all suppliers with a contractual agreement were, as a minimum, required to follow the Third Party Code of Conduct, suppliers’ own equivalent, or international standards.

In 2017, A.P. Møller – Maersk interacted with more than 100,000 suppliers in more than 100 countries, of which A.P. Møller – Maersk had a contractual relationship with more than 20,000 companies. Following a human rights and environmental due diligence exercise conducted in 2015, all A.P. Møller – Maersk businesses identified their top 10 high-risk supplier categories. There were 5,000 suppliers in these high-risk categories, enabling a more focussed approach to risk management. We defined a high-risk category as having a high risk of severe social or environmental impact when sourcing, producing or delivering to us either directly or through subcontractors (see below).

High risk category suppliers had to be assessed through the Responsible Procurement Programme before entering into contract with us. They were assessed using a combination of third-party audits, self-assessments and documentation reviews, where suppliers’ performance was compared against the requirements of the Third Party Code of Conduct. The assessments were reviewed either by the Responsible Procurement team or by an approved third-party auditor. Based on our findings, improvement plans were agreed and implemented.

In the mentioned due diligence exercise, the categories of:

- assets under construction; and
- manning and crewing agencies,

were prioritised for further risk assessment and potential action.

- **Assets under construction** included suppliers building vessels, tankers, rigs and terminals, where employment conditions of subcontracted workers could have

presented a risk. These suppliers had to be audited on-site prior to or shortly after contract signing.

- While indirect hiring and recruitment enables operational flexibility, it could pose a risk due to less direct oversight of how workers – often recruited across multiple countries by e.g. manning and crewing agencies or local contractors – are hired. When contracting **third party manning and crewing agencies** for our shipping businesses, we followed standardised auditing guidelines. These included: periodic audits and self-assessment questionnaires through our Responsible Procurement Programme; and additional assessments to ensure their compliance with the Maritime Labour Convention (MLC) standards before entering contracts.

For further information on progress, please see that section on human rights on the [A.P. Møller – Maersk Website](#) and the A.P. Møller – Maersk 2017 Sustainability Report available thereon.

### 3. Training

In 2015, we introduced trainings in labour relations and negotiations in an effort to distribute best practices. We have trained employees on an annual basis on issues related to modern slavery, including e-learning modules on the Global Labour Principles.

In 2016, we introduced training on labour relations and human rights for our internal health and safety auditors.

### Approval

This statement has been approved by the Board of Directors of Maersk Oil North Sea UK Limited. The Board has authorised a Director, Jean-Luc GUIZIOU, to sign the statement.

---

Signed

for Maersk Oil North Sea UK Limited

Jean-Luc GUIZIOU

Director

[ ] June 2018