



Statement on slavery and human trafficking

This statement sets out the steps that Nostrum Oil & Gas PLC (the “Company”) has taken to ensure that neither slavery nor human trafficking are taking place in any of our supply chains or in any part of our business, for the financial year ended 31 December 2019, pursuant to section 54 of the Modern Slavery Act 2015. This statement describes the activities of Nostrum Oil & Gas PLC and its subsidiaries (collectively, the “Group”).

Business Overview

We are an independent multi-field oil and gas company engaging in the production, development and exploration of oil and gas in the pre-Caspian Basin. At the end of the 2019 financial year we employed 636 personnel globally the majority of whom are located in Kazakhstan, with the remainder located in Europe.

The Group’s headquarters are based in the UK but the majority of the Group’s operations are primarily carried out in Kazakhstan through the Company’s wholly owned subsidiary, Zhaikmunai LLP. Employees based in London, Belgium and Amsterdam provide finance, legal and human resource services to the Group.

The Group has a global annual turnover of US\$322,128,000.

Further information on our structure and business is made available in our Annual Report 2019 at <https://nostrumoilandgas.com/investors/reports-presentations/>.

Supply chain

Our operations are supported by a supply chain for goods and services. Our supply chain mainly consists of suppliers of raw, direct and indirect materials, and skilled labour and services required for our exploration, evaluation, development, extraction, processing and transportation operations.

Risk assessment

Due to the nature of our business, we believe that the risks of slavery and human trafficking in our business are remote. While there are risks inherent in operating in Kazakhstan, we have taken the steps described herein to mitigate



the risks of slavery and human trafficking in our supply chains. We have mainly focused on our direct suppliers, as this is the level of the supply chain where we believe we can have the most influence and can therefore be most effective.

In order to mitigate the risks of slavery and human trafficking in our supply chains we have added relevant risks to our Directors' risk register to ensure that any such risks are recognised and closely monitored.

Code of Conduct

We are committed to ensuring that all persons employed by the Group act ethically and comply fully with all applicable laws and regulations.

We have a Code of Conduct (the "Code") that applies to our employees which, for the purposes of the Code, are stated to include secondees and independent contractors who devote the majority of their working time to the Group's business. The Code was updated in March 2016 to include a specific provision which states that the physical abuse of employees and the use of any form of forced labour, including prison labour, bonded labour, military labour, slave labour, child labour or any form of human trafficking is prohibited. The Code also indicates that we are committed to a work environment in which all individuals are treated with respect, that we prohibit discriminatory practices or harassment and that we are committed to preventing harm to the health and safety of our people. New employees are provided with a copy of the Code, which they must sign and acknowledge. Whenever the Code is updated, it is recirculated to all Group employees who are asked to sign and acknowledge the updated version. A copy of the Code is also available on the Group's intranet in both Russian and English and on the Company's website: <https://nostrumoilandgas.com/about/governance/>. Failure to comply with the Code may result in disciplinary action, including termination of employment.

Equality and Diversity

In 2017, the Board approved a new Equality and Diversity Policy which, amongst others, applies equally to the treatment of our supply chains. The objectives of the policy are to promote equality of opportunity and to ensure that no individual suffers unlawful discrimination, directly or indirectly, on the grounds of race, colour, ethnicity, religion, sex, gender, identity or expression, gender reassignment, national origin, age, marital status, disability or sexual orientation.



Human Rights

In 2019, the Board approved a new Human Rights Policy which applies to all who work for Nostrum but also to anyone doing business with Nostrum or acting on Nostrum's behalf. We also expect third party suppliers to uphold the principles of the policy by implementing similar policies within their own organisations. The policy aims to ensure that we conduct our business in a manner that respects the rights and dignity of all people, complying with all legal requirements and internationally recognised human rights.

We feel this policy further supports the measures the Group already had in place to mitigate the risks of slavery and human trafficking in our supply chains and further demonstrates our commitment to ensuring all persons employed by the Group act ethically.

Whistle-Blowing

We have a Whistle-Blowing Policy which takes account of the Whistle-blowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work and which applies to all individuals working for the Group at all levels and grades, whether they are senior managers, directors, employees, consultants or contractors. The Whistle-Blowing Policy sets out details of three compliance liaison officers that speak a variety of languages for the purposes of reporting any concerns. The Whistle-Blowing Policy is also mentioned in the Code and a person who reports any matter in good faith will be protected against any sanctions. A copy of the Whistle-Blowing Policy is available on the Group's intranet in the both Russian and English and on the Company's website: <https://nostrumoilandgas.com/about/governance/>.

At the time of writing we have received no reports under our Whistle-Blowing Policy of forced/involuntary labour or human trafficking in relation to our business or supply chains.

Supply Contracts

Following the coming into force of the Modern Slavery Act 2015, we conducted a review of the terms of our operational supply contracts entered into by the Group's operating subsidiary, Zhaikmunai LLP and updated them to include a provision requiring all suppliers to comply with the Code. All such suppliers are provided with a copy of the Code when entering into any supply agreement with the Group. The updated terms of supply also oblige any



supplier to the Group to ensure that any person associated with them who is performing services or providing goods in connection with their contract with the Group to do so only on the basis of a written contract which imposes on and secures from such person terms equivalent to those imposed in the Group's standard supply contracts. The aim of this provision is to mitigate the risks of slavery and human trafficking occurring further down the supply chain. Additionally, the updated terms of supply also oblige suppliers to annually certify, in writing, their compliance with the Code and to provide any supporting evidence of compliance that the Group may request.

In 2017, we conducted a review of our procurement checklists and policies to ascertain whether any updates are required to further mitigate the risks of incidences of slavery and human trafficking occurring in our supply chains and business and as a result we updated our Purchasing Policy to provide that all procurement activities conducted by the Group must comply with, amongst other things, the Group Code of Conduct and the Whistle-Blowing Policy.

Effectiveness and performance review

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be a non-compliance and breach of employment laws, our employment practise and Group policies and standards including our Code.

The Board of Nostrum Oil & Gas PLC approved this statement on 26 March 2020.

By order of the Board

Kaat Van Hecke
Chief Executive Officer
26 March 2020