



SONATRACH PETROLEUM CORPORATION

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ANTI-SLAVERY POLICY

**SONATRACH PETROLEUM CORPORATION
(THE "COMPANY")**

LK/LPD/7506



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1. INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

SPC has zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships by implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its business activities.

SPC is also committed to ensuring there is transparency in its approach to tackling modern slavery, consistent with the disclosure obligations under the Modern Slavery Act 2015.

The company expects the same high standards from all of its contractors, suppliers and other business partners and as part of its contracting processes, has included specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expects that its suppliers will hold their own suppliers to the same high standards.

If any changes are made to this Policy, the updates will be notified to employees by email and placed on the Intranet and website of the Company.

2. OBJECTIVE

The objective of this Policy is to outline SPC's zero tolerance position in relation to modern slavery and human trafficking.

3. SCOPE OF APPLICATION

This Policy applies to everyone: Directors, Managers, Employees of the Company, as well as the Partners with whom SPC works in the context of its commercial or administrative relationships: Suppliers, Clients, Subcontractors, Consultants, Administration, etc.



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4. RESPONSIBILITIES

All members of SPC staff are affected by this Policy.

SPC's Directors and Management has overall responsibility for ensuring this Policy complies with SPC's legal and ethical obligations, and that all those under SPC's control comply with it.

The designated Person in charge of Compliance has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and assessing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

5. PLAN FOR THE FIGHT AGAINST MODERN SLAVERY AND HUMAN TRAFFICKING

5.1 Code of Conduct

SPC has adopted the Anti-Corruption Policy, drawing from the Code of Conduct of the SONATRACH Group, with a view to promoting the values of ethics and integrity and maintaining its reputation.

5.2 Human Resources Guide

The Employee Handbook provides more detailed guidance about human resources rules, in order to avoid any situation that could present a risk in relation to modern slavery and human trafficking.

5.3 Due diligences

The rules concerning the due diligence relating to commercial sale and purchase transactions, in particular through the implementation of the KYP (Know Your Partner) Procedure with the Suppliers and Clients, as well as the introduction of key provisions concerning compliance with the anti-corruption and anti-slavery laws.



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5.4 Awareness and Training

All members of SPC staff must ensure that they read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of its business is the responsibility of all those working for the company or under the company's control.

All members of SPC staff are required to avoid any activity that might lead to a breach of this Policy.

Training on this Policy and on the risk the business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the company, and regular training will be provided as necessary.

SPC's commitment to addressing the issue of modern slavery in its business and supply chains, must be communicated to all suppliers, contractors and business partners at the outset of the business relationship with them and reinforced as appropriate thereafter.

5.5 Reporting System

All members of SPC staff must notify to their immediate manager, the Human Resources Department or the designated Person in charge of Compliance as soon as possible if they believe or suspect that a conflict or breach with this policy has occurred.

In addition, they are encouraged to raise genuine concerns, in good faith, under the Whistleblowing Policy defined in SPC's Employee Handbook.

SPC is committed to ensuring no one suffers any detrimental treatment, as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of its business or in any of its supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

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5.6 Control

SPC's Directors and Management analyse all information reported by employees to their immediate manager, the Human Resources Department, the designated Person in charge of Compliance or by Whistleblowing Policy defined in the SPC's Handbook, in order to insure compliance with this Policy and to undertake the necessary measures for improvement and actions to be carried out.

**For and on behalf of Sonatrach Petroleum Corporation BVI
C/O Sonatrach Petroleum Corporation**

**M. R. DEMMAK
Directeur Général**

Date: 20 / 07 / 2020