

Genel Energy Plc

Modern Slavery Act Statement

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) and is the statement of Genel Energy plc (Genel or the Company) and its subsidiaries for the financial year ending 31 December 2022.

Our business

Genel Energy is a socially responsible oil producer listed on the main market of the London Stock Exchange and headquartered in London with offices in Istanbul and Erbil. Genel has over 100 employees worldwide and has low-cost and low-carbon production from the Kurdistan Region of Iraq, where we have been operating for over a decade.

Our supply chain

Genel recognises that whilst the risk of human rights violations and modern slavery occurring within our business is low there is an increased risk within the supply chain in certain locations in which we operate. We are committed to the requirements of the Act and taking all reasonable steps to ensure modern slavery and human trafficking are not taking place in any part of our business or in our supply chain. The Company relies on both international and local suppliers as part of its ordinary course of business. Contractors and suppliers are expected to conduct their activities in a manner that respects human rights as set out in the core conventions of the International Labour Organization (ILO). As part of our Business Partner approval process and ahead of payment runs to suppliers being authorised, due diligence on all our Business Partners and suppliers is performed using screening tools operated by Dow Jones, and this includes checks on whether a supplier has been convicted of offences in relation to modern slavery. Where any issues are identified as a result follow up action is taken.

Our policies and processes

Genel is committed to both acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains. As part of our commitment to preventing modern slavery, Genel has an ‘Anti-slavery and Human Trafficking Policy’ in place. This policy is available to all employees across the business in English, Turkish, and Kurdish, reflecting the diversity of languages spoken by our employees. We recognise our responsibility to respect human rights and our approach applies to all of our employees. Our policies are informed by the International Labour Organization which covers freedom of association and the effective recognition of the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation. Our approach aligns with the United Nations Guiding Principles on Business and Human Rights and human rights is embedded into our policies, business system, and processes.

Following Genel’s human rights compliance risk assessment in 2021, we revised our Code of Conduct in 2022, setting out a clear expectation of how we expect our people to behave when carrying out any activities that are directly or indirectly related to our business. It specifically recognises the importance of respecting and promoting human rights both internally and externally. These values are reinforced in our recruitment policies and contracting processes. Training on modern slavery and forced labour, and on our standards and guidelines in this area, has been provided to employees. Any failure by our employees to adhere to our Code of Conduct and our policies may result in disciplinary action.

In addition, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory, or trafficked labour. We have included a clause in our contracts which requires our suppliers to hold their own suppliers to the same high standards as a condition of doing business with Genel. If a contractor or supplier fails to act in accordance with our contractual obligations and our expectations this may result in the termination of their contract with Genel.

The Company believes a culture of openness and accountability is essential in order to prevent unethical behaviour and to address it when it does occur. Our Whistleblowing Policy was revised in 2021 to reinforce our commitment to the Whistleblowing process and incorporate a “Grievance Policy”. This is in context of the public commitment we have given to observe the requirements of United Nations Global Compact, one aspect of which requires Genel to establish a grievance mechanism under which third parties (i.e., external to Genel) can raise grievances with the company, including in the human rights context. The Whistleblowing and Grievance Policy applies to all individuals working at all levels within the Group, including Genel directors, officers, employees, contract employees, and any stakeholder third parties. Genel operates a whistleblowing hotline, comprised of dedicated phone lines and a web portal, which enable employees and third parties to report concerns on a range of matters including human rights violations such as slavery and trafficking. The hotline and/or the web portal is available in a number of languages and is accessible in all of our locations. Every incident of whistleblowing is reported to our Board of Directors and investigated fully.

Assessment of effectiveness in combating slavery and human trafficking

At the time of writing, we are not aware of any current or recent incidents or accusations of slavery or human trafficking in our operations.

This statement has been approved by the Board of Genel Energy plc on 16 March 2023.

For more information on our policies and procedures, please visit our website.



Paul Weir, CEO
Genel Energy plc