STATEMENT ON MODERN SLAVERY

ConocoPhillips (U.K.) Limited

ConocoPhillips (U.K.) Limited (“CPUKL”) has a zero tolerance of modern slavery in all its different forms both in its business and its supply chain. This is CPUKL’s third Modern Slavery Statement responding to the requirements of the Modern Slavery Act 2015 (“the Act”). This statement sets out the steps taken by CPUKL since May 2018 to prevent modern slavery and human trafficking in its business and supply chains.

OUR BUSINESS

CPUKL is the main UK trading company in the ConocoPhillips UK Group (which includes a range of companies, including CPUKL and its subsidiaries, ConocoPhillips Petroleum Company U.K. Limited and its subsidiaries and Burlington Resources (Irish Sea) Limited (the “Group”). The Group owns and operates a diverse range of exploration and production assets in the United Kingdom and is part of the ConocoPhillips global organisation. Full details of the ConocoPhillips entities covered by this statement are provided in Annex 1.

OUR APPROACH

The Group has zero tolerance of slavery and human trafficking in all its different forms in any part of its business and in its supply chain. The approach reflects a commitment to act ethically and responsibly in all business relationships and to ensure that slavery and human trafficking are not present in any part of its business or in its supply chain. For further information about the Group’s responsible business practices refer to the ConocoPhillips Code of Business Ethics and Conduct, the Human Rights Position Statement and the ConocoPhillips Code of Business Ethics and Conduct: Supplier Expectations.

The Group supports and is committed to conducting our business consistent with the human rights philosophy expressed in the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

The Group requires contractors, suppliers and service providers to adhere to all domestic laws and encourage them to conduct their business in a manner consistent with the Group’s Code of Business Conduct and Ethics, Human Rights Position Statement and the Code of Business Ethics and Conduct Supplier Expectations. The Group expects employees, suppliers and contractors to comply with these expectations.

The Group has a global helpline in place for all employees and contractors within the Group to raise concerns and report instances of potential non-compliances with our Code of Business Conduct and Ethics, in full confidence without any fear of retaliation.
MANAGING RISK IN THE GROUP’S SUPPLY CHAIN

The Group takes a risk-based approach to monitoring suppliers and contractors’ compliance with applicable laws, including those relating to modern slavery and human trafficking.

To manage the risk of modern slavery existing within the supply chain, new suppliers who have entered the Group’s supply chain have been made aware of the Group’s standards in relation to modern slavery. In support of this, the standard contracts used by the Group’s supply chain teams when agreeing new contracts require contractors and suppliers to respect internationally recognised human rights, including those related to modern slavery.

Training is critical to ensuring the Group’s respect for human rights. The Group builds awareness of the Group’s polices and statement on human rights and expectations amongst directors, employees, contractors and suppliers. Training is available to all Group employees, with face to face training focused on individuals and functions most likely to face issues related to human rights.

LOOKING AHEAD

The Group understands that it has a responsibility to continue to assess and mitigate the risk of modern slavery in the long term. In 2018/2019 the Group continued to review the nature of risk and implemented controls to manage it. It is expected that the nature of the risk may change over time and ongoing adaption by the Group will be required.

To understand how effective its efforts are and to ensure modern slavery does not exist within any of its business activities in 2019/2020 the Group aims to:

- Implement additional supplier due diligence to support existing compliance arrangements and to identify and investigate any areas of concern in relation to modern slavery and human trafficking
- Continue to deliver a programme of awareness training to functions most likely to encounter issues related to human rights to help them to continue to identify high risk factors and enhance their understanding of modern slavery compliance.

GOVERNANCE

This statement is made pursuant to section 54 of the Act and constitutes the Group’s slavery and human trafficking statement for the financial year ending on 31 December 2018. It further outlines the Group’s approach to tackling slavery and human trafficking.

This statement has been approved by the CPUKL Board of Directors on behalf of the Group. A new statement will be published each year on the corporate website www.conocophillips.co.uk.

Terri G. King
President, UK
ConocoPhillips (U.K.) Limited

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