

FY 2020 Modern Slavery Act Statement

This Statement for the Modern Slavery Act 2015 (the “Statement”) is published pursuant to Section 54(1) of the Modern Slavery Act 2015 of the United Kingdom (UK). JAPEX hereby discloses the steps it has taken during its financial year ended on March 31, 2021 to ensure slavery and human trafficking are not taking place in the business and supply chains of JAPEX Group as follows:

1. About JAPEX

JAPEX is engaged in oil and gas exploration and production in Japan and overseas mainly in North America, Southeast Asia and Middle East. JAPEX participates in exploration and development activities in the UK North Sea. Please visit to the link below for more information:

<https://www.japex.co.jp/en/>

2. JAPEX’s Policies

(1) Corporate Vision and JAPEX Group Code of Ethics and Conduct

A key part of JAPEX’s corporate vision is to make stakeholder trust its highest priority while striving to achieve sustainable growth and maximize corporate value.

For materializing JAPEX’s Corporate Vision, JAPEX Group’s directors, officers and employees shall act based on the “JAPEX Group Code of Ethics and Conduct”. The Code of Ethics and Conduct was revised in FY2020 and further enhanced the description regarding respect for human rights.

The Code of Ethics and Conduct requires the following with regard to respect for human rights including the prevention of modern slavery and human trafficking;

- Comply with applicable laws and regulations, and respect international code of conduct.
- Strive to maintain trust with stakeholders and to contribute to society.
- Respect the human rights of all people.
 - Recognize and respect human rights as a universal concept that everyone has equality
 - Respect international norms of human rights and not to do or engage in discriminations or harassments of any kind such as on the basis of gender, age, nationality, race, skin color, culture, customs, religion, sexual orientation, and disabilities
 - Prohibit forced labor and child labor, and do not take complicit action to them.

Please visit to the link below for more information:

<https://www.japex.co.jp/en/company/overview/vision/>

(2) Compliance Manual

Concerning compliance matters relating to laws and regulations, conventional wisdom and social norms stipulated in JAPEX Group Code of Ethics and Conduct, JAPEX’s Compliance Manual refers to the standards which JAPEX Group’s directors, officers and employees are required to comply with in their business operations and stipulates importance of respect for the human rights based on the Universal Declaration of Human Rights, International Covenants on Human Rights and ILO International Labor Standards.

(3) Participation in International Initiatives

JAPEX has participated in the United Nations Global Compact (UNGC) since May 2020. Based on the UNGC's ten principle, JAPEX strives to respect human rights under the commitment of top executives.

3. JAPEX's Activities

(1) Supply Chain Management

With the basic policy of procurement established, JAPEX conducts procurement activities in accordance with the following compliance principles.

In procurement activities, JAPEX complies with relevant laws and regulations, their spirit, and social ethics and norms, and asks suppliers and contractors to comply with the same. JAPEX does not make any business deal which is contrary or harmful to its corporate vision. JAPEX aims to maintain a stable and safe business environment in cooperation with our business partners.

(2) Investment Evaluation and Project Management Process

During Investment Evaluation and Project Management Process, JAPEX identifies not only commercial and technical issues but also actual and potential environmental and social issues, and thoroughly evaluates risks and their mitigation plans. Based on the foregoing, JAPEX properly manages these risks by implementing appropriate measures, such as monitoring, according to company rules and regulations.

(3) Compliance Reporting and Consultation Systems

JAPEX has established not only internal helpline but also external helpline, engaged by the JAPEX company attorney, for receiving reports and consultations on all compliance matters, including respect for human rights as outlined in the Compliance Manual. The helpline services are available under anonymity for employees making reports and consultations and designed to secure confidentiality and prohibition of disadvantageous treatment for the employees using helpline services.

(4) Education

JAPEX makes efforts to keep employees informed of the policies as stated in Section 2 above, and places "compliance" as basic matter that employees must remain aware of in their conduct of business. In practice, JAPEX provides its group's employees with training opportunities on a regular basis and also gives mandatory training program on fundamental compliance matters to new employees and those employees at appropriate stages in their careers every year.

JAPEX also provided education for executives and employees by distributing e-mail newsletters to raise awareness of harassment prevention. In addition, in FY2020, training on harassment prevention was conducted for executives and department manager-level employees.

September 30, 2021

A handwritten signature in black ink, appearing to read 'K. OzeKi', written in a cursive style.

Kazuhiko OZEKI
Representative Director, Executive Vice President
Japan Petroleum Exploration Co., Ltd.