

# Juste Energie Tools Ltd

## Modern Slavery Act Transparency Statement

*For the financial year ending: 31 December 2024*



*This statement was approved by the Board of Juste Energie Tools Ltd on December 21, 2024*

# INTRODUCTION

This Modern slavery and Human Trafficking Statement is made on a voluntary basis by Juste Energie Tools Limited (“Juste Energie”, “the Company”, “we”, “our”, or “us”) in accordance with the UK Modern Slavery Act 2015. Although we do not meet the legal threshold for mandatory reporting and do not operate in the United Kingdom, we are committed to 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 and human trafficking are not taking place in any part of our business or supply chains.

Modern slavery encompasses slavery, servitude, human trafficking, and forced or compulsory labour. Juste Energie is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our operations.

## OUR BUSINESS

Juste Energie Tools Limited was incorporated in 2021 and operates as a privately owned oil servicing firm. We specialise in the design and commercial sale of advanced drill bits used in oil and gas exploration and production. Our headquarters are located in Nigeria, where we conduct all our business operations.

We do not have subsidiaries or partners in the UK. While we are not legally required to publish this statement under the UK Modern Slavery Act 2015, we choose to do so voluntarily to demonstrate our commitment to ethical practices and human rights.

## OUR SUPPLY CHAINS

Our supply chain consists primarily of international manufacturers based in Belgium and the United States who produce the drill bits we design and sell. While we do not own or control these suppliers, we recognise that the global nature of supply chains presents inherent risks in relation to labour exploitation and modern slavery.

We are in the process of establishing supplier assessment and due diligence procedures to better understand and manage these risks. Going forward, we intend to implement formal checks and screening mechanisms to verify that our suppliers operate in a manner consistent with our values and legal expectations.

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## POLICIES AND COMMITMENTS

Juste Energie Tools Limited has an internal Ethical Code of Conduct that outlines our expectations regarding ethical behaviour, labour rights, and compliance with local and international laws. The Code applies to all employees, contractors, and partners who act on behalf of the company.

We are committed to fostering an environment that is respectful, inclusive, and free from any form of coercion or exploitation. To that end, we are working to extend these ethical principles to our suppliers and expect them to adhere to similar standards.

## DUE DILIGENCE AND RISK ASSESSMENT

Although formal supplier audits have not yet begun, we carry out informal due diligence to identify and assess modern slavery risks in our supply chain. This includes engaging with suppliers to understand their labour practices, reviewing publicly available information, and monitoring for potential risk indicators.

In addition, we are actively developing a formal framework to assess and monitor modern slavery risks more systematically. This will include:

- Evaluating the labour practices of key suppliers,
- Requiring contractual commitments to anti-slavery standards,
- Establishing escalation procedures for concerns or breaches,
- Taking corrective action where non-compliance is identified.

We will continue to refine our due diligence process as we grow and gain more insight into potential risk areas.

## TRAINING AND AWARENESS

All Juste Energie employees receive training on our Ethical Code of Conduct, which includes guidance on identifying and reporting modern slavery and human trafficking. We believe that awareness and education are key to prevention and early detection.

We are also committed to expanding this training to cover emerging best practices in supply chain risk management and ethical sourcing.

## MEASURING EFFECTIVENESS

As we continue to formalise and strengthen our approach to tackling modern slavery, we intend to measure the effectiveness of our policies and processes through the following indicators:

- Implementation of supplier due diligence procedures,
- Completion rates of employee training on ethical conduct and labour rights,
- Internal reporting of concerns and their resolution,
- Ongoing policy reviews and updates based on risk assessments.

We recognise that this is an evolving area and are committed to continuous improvement.

## FUTURE STEPS

In the coming year, we aim to:

- Launch a formal supplier evaluation and monitoring system,
- Extend our Ethical Code of Conduct to cover third-party suppliers,
- Provide advanced training for procurement and supply chain personnel,
- Collaborate with peers and industry bodies to promote best practices.

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We are committed to transparency, accountability, and proactive engagement in eliminating all forms of modern slavery from our operations and supply chains.

## APPROVAL AND SIGN-OFF

This statement has been approved by the Board of Directors of Juste Energie Tools Limited.

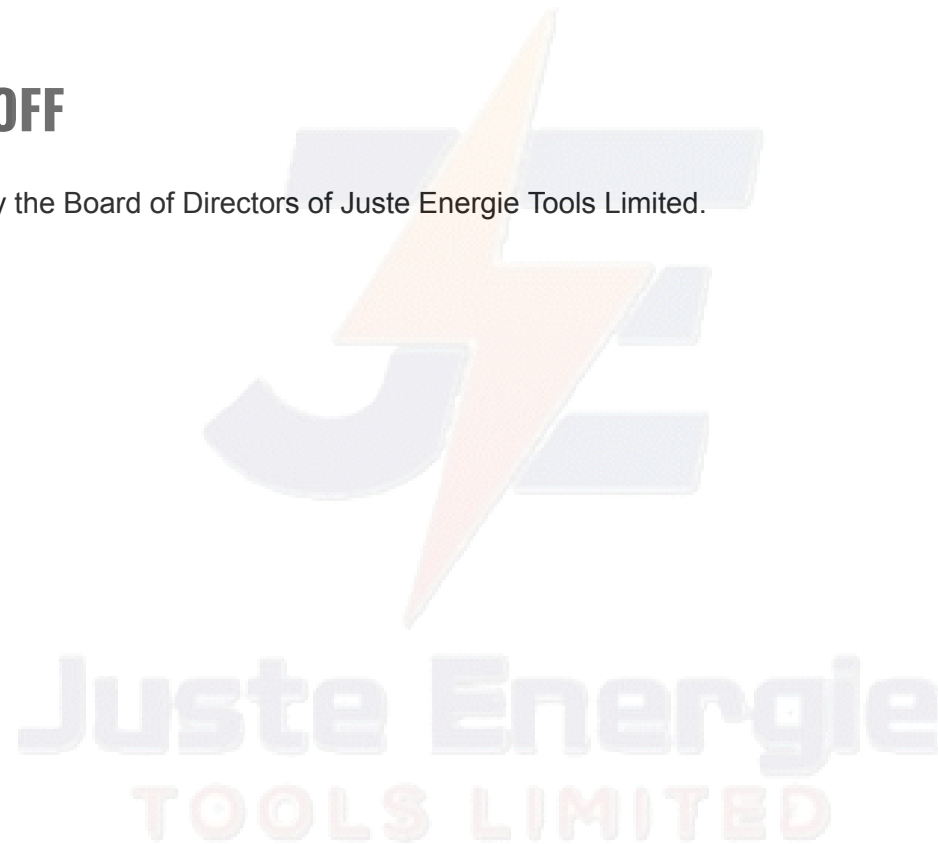
On behalf of the Board:

John Edamwen Ozigbo

Chief Executive Officer

Juste Energie Tools Limited

Date: December 21, 2024



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