



**ROCKROSE  
ENERGY**

Part of Viaro GROUP

**ROCKROSE ENERGY LIMITED  
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT  
FOR FINANCIAL YEAR ENDED 31 DECEMBER 2024**

**RockRose Energy Group**

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## **Introduction**

RockRose Energy Group ("RockRose") is dedicated to operating its business with integrity, accountability, and responsibility. We maintain a zero-tolerance stance toward modern slavery and human trafficking in all their forms. This statement outlines the steps we have taken during the financial year ending 31 December 2024 to combat modern slavery and human trafficking within our operations and supply chains, in compliance with Section 54(1) of the UK Modern Slavery Act 2015.

## **Our Business**

RockRose is an independent oil and gas company, focused on operations across the UK and the Netherlands. Our business spans exploration, development, and production, involving non-operated assets in more than 20 producing assets. Our supply chains involve a broad spectrum of suppliers and contractors providing essential goods and services for our operations.

In 2024, RockRose continued implementing its long-term growth strategy, strengthening its production portfolio and moving closer to operatorship in the North Sea. On 30 July 2024, RockRose entered into a Sale and Purchase Agreement ("SPA") with Shell U.K. Limited, a subsidiary of Shell plc, and Esso Exploration and Production UK Limited, a subsidiary of ExxonMobil Corporation, for the acquisition of upstream natural gas assets in the UK Southern North Sea ("SNS"). This transaction, which includes 11 producing fields, an exploration prospect, and the onshore Bacton Terminal, is expected to be completed in the second half of 2025, strengthening Rockrose's production profile and establishing it as an operator in the region.

## **Actions to Prevent Modern-Day Slavery**

RockRose is committed to ensuring that we not only comply with the Modern Slavery Act but also uphold the highest ethical standards throughout our business operations. Our actions to

combat modern slavery focus on policies, due diligence, and ongoing improvements across our operations. Key measures include:

## **Due Diligence / Supply-Chain**

RockRose considers the risk of modern slavery and human trafficking occurring within its business and supply chains to be relatively low, given the jurisdictions and sector in which it operates. However, we carry out comprehensive due diligence across our supply chains to identify and address potential human trafficking and slavery risks at the earliest possible stage. Through robust checks and ongoing monitoring, we strive to ensure that our supply chains remain free from exploitation and abuse.

As part of our ongoing efforts to combat modern slavery, we developed a Supplier Code of Conduct, which requires all partners to meet our ethical standards, especially regarding slavery and human trafficking. New suppliers, including those from the Shell acquisition, must comply with this code to ensure they uphold the same high ethical standards we maintain.

As a joint venture partner in our non-operated assets, RockRose ensures that operators and contractors comply with guidelines that are aligned with our modern slavery policies. This includes evaluating third-party contractors to ensure adherence to anti-slavery standards before entering into contractual agreements.

## **Policies and Procedures**

Rockrose has extensive Policies and procedures to combat modern slavery across our operations:

- **Code of Conduct:** Our Code of Conduct explicitly prohibits slavery and human trafficking, and is at the core of our commitment to ethical business practices. This code guides our employees and business partners on ensuring ethical and legal compliance.
- **Modern Slavery Policy:** We have established a dedicated Modern Slavery Policy that clearly outlines our position on human trafficking and forced labour, forming part of our broader corporate social responsibility and ethical operations.

## **Training and Awareness**

We are committed to raising awareness and training all employees and contractors to identify and respond to potential modern slavery risks:

- All employees and contractors undergo Annual comprehensive training on our Code of Conduct, which includes a specific focus on modern slavery awareness. This training is designed to promote understanding and awareness of modern slavery and human trafficking, as well as the provisions outlined in the Act. It further educates individuals about the risks of human trafficking and how to prevent and report such activities.

## **Monitoring and Reporting**

RockRose encourages a culture of openness and transparency. Therefore, we provide multiple channels for employees to report concerns or suspicions regarding modern slavery or other unethical practices. Our independent third-party whistleblowing platform allows employees and partners to report concerns anonymously, protecting individuals from retaliation and swiftly addressing all problems.

## **Annual Review and Updates**

This statement will be reviewed and updated annually to ensure its effectiveness. We will continue to assess the ongoing success of our actions and policies, making adjustments where necessary as we expand our operations, especially following the Shell/Esso acquisition.

## **Transition Plan Post-Shell/Esso Acquisition**

As part of our recent acquisition of upstream gas assets from Shell/Esso, including 11 producing fields and the Bacton Terminal, RockRose is committed to upholding and improving our anti-modern slavery standards:

- We will ensure that all acquired operations comply with our modern slavery prevention policies. This includes integrating the Shell assets into our existing supply chain assessment process and ensuring that any new suppliers or contractors meet Rockrose's ethical standards.

- We will work closely with new suppliers to communicate our expectations regarding modern slavery, ensuring that they are fully aware of our Code of Conduct and comply with our anti-slavery policies.
- As part of the integration process, employees in the newly acquired operations will receive the same comprehensive training on modern slavery and our policies. This will ensure consistent adherence to the highest ethical standards across the organisation.

### **Declaration**

RockRose Energy Limited has evaluated its operations and determined that the risk of modern slavery and human trafficking within its business is low. However, we remain committed to regularly reviewing and enhancing our efforts to combat modern slavery, ensuring the ongoing effectiveness of our policies across our expanding operations.

This statement is approved by the Board of Directors and signed on its behalf by:



Francesco Mazzagatti  
Director  
RockRose Energy Limited