



**ROCKROSE**  
ENERGY

## **ROCKROSE ENERGY PLC**

### **MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2019**

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the “Act”) and sets out the approach which RockRose Energy plc and its affiliates (together “RockRose Energy Group”) have taken to understand all potential modern slavery risks related to their business and the actions undertaken to mitigate any such risks during the financial year ending 31 December 2019.

RockRose Energy Group’s area of business is oil and gas production which takes place in the United Kingdom Continental Shelf (the “UKCS”) and the Dutch Continental Shelf. For the purpose of providing this statement, RockRose Energy Group’s business has been divided into operated and non-operated assets, as set out below. The distinction being that the supply chain and potential risk of modern slavery for its operated assets would be higher as compared to its non-operated assets.

#### **Operated Assets**

RockRose UKCS8 LLC (“UKCS8”), a fully owned subsidiary of RockRose Energy plc, currently operates the Brae Complex in the UKCS. UKCS8 is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its operations. UKCS8 operates the following guidelines, policies and procedures which aid the identification of modern slavery risks and human trafficking in its business: Modern Slavery Guidelines, Code of Business Conduct, Corporate Responsibility, Whistleblowing, Security and Human Rights.

As part of its process to identify and mitigate risk, UKCS8 also uses Achilles First Point Assessment (“FPAL”) which qualifies, evaluates and monitors suppliers on behalf of the UK oil and gas industry. FPAL assists UKCS8 in its complying with the requirements of section 54 of the Act.

### **Non-Operated Assets**

Aside from that of UKCS8 the remainder of RockRose Energy Group's direct supply chain is not extensive in nature and primarily consists of companies providing engineering and technical studies. In order to meet its business requirements RockRose Energy Group strives to ensure that only high quality suppliers are utilised. Accordingly, RockRose Energy Group employs a stringent selection and risk assessment process whereby suppliers are only appointed who fully comply with RockRose Energy Group's corporate and ethical standards.

As a joint venture partner, in its non-operated assets, RockRose Energy Group ensures that, insofar as it may be within RockRose Energy Group's ability to do so, its joint venture partners, and in particular any such partner acting on behalf of RockRose Energy Group in the capacity as Operator of an asset, when contracting with a third party, follow guidelines which are compliant with RockRose Energy Group's policies. Any such third party contracting is therefore also stringently risk assessed against RockRose Energy Group's corporate and ethical standards.

### **Declaration**

Due to RockRose Energy Group's approach to governance, the provision of relevant training and the procedures in place, in both its operated and non-operated assets, we have assessed that there is low risk of slavery and human trafficking in RockRose Energy Group's business. However, RockRose Energy Group aims to periodically review the effectiveness of the relevant policies and procedures that are in place so as to ensure compliance with all applicable regulatory and legal requirements. RockRose Energy Group does not have key performance indicators in relation to slavery or human trafficking as any instance would be a breach of law and/or RockRose Energy Group's company policies.

The Board of Directors is committed to delivering high standards of corporate governance and a key element of this is to manage RockRose Energy Group in a socially responsible way. RockRose Energy Group aims to employ the highest ethical and professional standards and always to comply with all laws and regulations applicable to its business. It follows that RockRose Energy Group is committed to preventing slavery and human trafficking in its corporate activities and its supply chain. This commitment is set out in



RockRose Energy Group's company policies which must be adhered to by all employees, agents and consultants.

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

A handwritten signature in black ink that reads "Andrew Austin".

Andrew Austin

Executive Chairman