



ROCKROSE
ENERGY

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ROCKROSE ENERGY LIMITED

MODERN SLAVERY ACT STATEMENT FOR FINANCIAL YEAR ENDED 31 DECEMBER 2020

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 Limited and its affiliates (see attached Schedule) (together the “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 2020.

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 (**note:** The RockRose Energy Group’s business became fully non-operated on 30th September 2020 and the section, below, in relation to “Operated Assets” will only apply up to the aforementioned date).

Operated Assets

Up to 30th September 2020 RockRose UKCS8 LLC (“UKCS8”) (a former member of the RockRose Energy Group as at 15th December 2020) operated the Brae Complex in the UKCS. UKCS8 ensured that there was no modern slavery or human trafficking in its supply chains or in any part of its operations. UKCS8 operated 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 used Achilles First Point Assessment (“FPAL”) which qualifies, evaluates and monitors suppliers on behalf of the UK oil and gas industry. FPAL assisted UKCS8 in complying with the requirements of section 54 of the Act.

Members of RockRose Energy Limited - Registered Number 09665181; Registered Office address: 9th Floor 107 Cheapside, London, United Kingdom, EC2V 6DN

Companies registered in England and Wales; RockRose (UKCS 1) Ltd - Registered Number 10448997. RockRose (UKCS 2) Ltd - Registered Number 08724360. RockRose (UKCS 3) Ltd - Registered Number 04620801. RockRose UKCS 4 Ltd - Registered Number 02552901. RockRose UKCS 5 Ltd - Registered Number 06088753. RockRose UKCS 6 Ltd - Registered Number 03442626. RockRose UKCS 7 Ltd - Registered Number 01908768. RockRose UKCS 9 Ltd - Registered Number 01293052. RockRose UKCS 10 Ltd - Registered Number 04105025.

Companies registered in Scotland; RockRose UKCS 14 Ltd - Registered Number SC544871.

Companies registered in Holland; RockRose (NL) CS1 B.V. - Registered Number 30108055. RockRose (NL) Infrastructure B.V. - Registered Number 30221313.

Non-Operated Assets

Aside as from set out above the remainder of RockRose Energy Group's direct supply chain is not extensive in nature and primarily consists of companies occasionally providing engineering and technical studies. 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 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, that 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 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 previously 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 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 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 and consultants.

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



Francesco Mazzagatti
Director

**SCHEDULE OF ROCKROSE ENERGY LIMITED AFFILIATED COMPANIES
INCLUDED IN THIS STATEMENT**

1. RockRose (UKCS2) Limited
2. RockRose (UKCS3) Limited
3. RockRose UKCS4 Limited
4. RockRose UKCS8 LLC (included in this Statement up to 15 December 2020 following which it ceased to be a member of the RockRose Energy Group)
5. RockRose UKCS 9 Limited
6. RockRose UKCS 10 Limited
7. RockRose UKCS 11 Limited (included in this Statement up to 15 December 2020 following which it ceased to be a member of the RockRose Energy Group)
8. RockRose UKCS 12 Limited (included in this Statement up to 15 December 2020 following which it ceased to be a member of the RockRose Energy Group)
9. RockRose UKCS13 LLC (included in this Statement up to 15 December 2020 following which it ceased to be a member of the RockRose Energy Group)