### **Modern Slavery Act Statement**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act") and relates to the financial year ending 31 December 2024.

The Board and management of Repsol Resources UK Limited and its subsidiaries (the "**Group**")<sup>1</sup> is committed to ensuring that there is no slavery, servitude, forced or compulsory labour or human trafficking ("**Modern Slavery**") in our supply chain or in any part of our business. Our commitment to acting in a safe, ethical and responsible manner wherever we do business and with all those we deal with is at the core of our values. All those in our supply chain must comply with our Code of Ethics and Business Conduct for Suppliers and all applicable laws including the Act.

### **OUR STRUCTURE AND BUSINESS**

Repsol Resources UK Limited is an oil and gas exploration and production company headquartered in Aberdeen and operating in the UK North Sea. The Group operates 11 offshore installations (ten fixed and one floating) and two onshore terminals. Further details about our business can be found on our website - <a href="https://www.repsolresourcesuk.com/">https://www.repsolresourcesuk.com/</a>

### **OUR SUPPLY CHAIN**

Our supply chain incorporates the sourcing of services and procurement of goods from multiple energy related sectors. We look to procure products and services from high quality suppliers capable of providing solutions that meet the Group's business requirements and standards. We achieve this through a robust sourcing process and ongoing management of contracts entered into with suppliers who can reliably and predictably deliver the desired results and who fully comply with our safety, environmental, ethical and technical standards. The Group's standard terms and conditions include an obligation to comply with all applicable legislation including the Act.

## **OUR RISK ASSESSMENT**

We have undertaken an internal risk assessment to identify and assess potential risks in our business and supply chain. The risk assessment is kept under regular review to ensure it is up to date.

# **OUR CODE OF ETHICS AND BUSINESS CONDUCT**

We are committed to ensuring that there is no Modern Slavery in our supply chain or in any part of our business and impose those same high standards when engaging with third parties. On the one hand, and among other corporate policies, the Repsol Code of Ethics and Business Conduct reflects our commitment to act ethically and with integrity in all our business relationships and at all times to conduct our business activities in a manner that promotes and respects human rights. The Repsol Code of Ethics and Business Conduct for Suppliers provides the minimum standard of behaviour that can be reasonably expected from all suppliers along its/their supply chain(s) and reflects our commitment to human rights, integrity and ethical behaviour, environmental protection and safety,

<sup>&</sup>lt;sup>1</sup> The Group is defined as consisting of, and this statement is made in respect of each of the following companies: Repsol Resources UK Limited, Repsol North Sea Limited, Repsol Oil Trading Limited, Transworld Petroleum (U.K.) Limited, Repsol Transportation (UT) Limited, Repsol Alpha Limited, Repsol Beta Limited, Repsol LNS Limited, Rigel Petroleum UK Limited, Rigel Petroleum (NI) Limited, Repsol Pension and Life Scheme Limited, Repsol Trustees (UK) Limited, Repsol Delta Limited and Repsol Zeta Limited

as well as the protection and transparency of information to promote a sustainable economy. The Group's standard supplier contractual terms include an obligation to comply with our Code of Ethics

and Business Conduct for Suppliers.

**D**UE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

Repsol has in place a supply chain risk management model to identify, evaluate and minimise environmental, social and governance (ESG) risks, and in particular, risks for slavery and human

trafficking at different stages of the procurement process when engaging with new suppliers.

Significant new suppliers are subject to an obligatory due diligence questionnaire using an online screening/compliance tool designed by an external consultant. Where we perceive a particular risk of Modern Slavery, we undertake enhanced due diligence to ensure that the supplier meets acceptable standards. We take a risk-based approach to monitoring our suppliers and this includes improving how we evaluate existing suppliers. When appropriate for monitoring purposes we have

the right to conduct an audit.

TRAINING AND REPORTING CONCERNS

On a yearly basis, the Group provides online training on the Repsol Code of Ethics and Business Conduct which is mandatory for all employees worldwide. We place a particular importance on awareness of Modern Slavery by those in our supply chain and procurement team. Through our training programme, all personnel are encouraged to identify and report any potential breaches of our Code of Ethics and Business Conduct to the Repsol Ethics and Compliance Channel. Suppliers

can also access the Compliance Channel to report any concerns they may have.

**OUR EFFECTIVENESS IN PREVENTING MODERN SLAVERY** 

We will use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply

chain:

Ensure there are appropriate provisions in contracts with key suppliers;

Monitor the number of reports made and remedial action taken; and

Compliance with mandatory online training on the Code of Ethics and Business Conduct.

We are committed to improving our practices to combat Modern Slavery. We will review the effectiveness of the steps we have taken and, if necessary, take further steps to combat any risks

identified after the date of this statement.

This statement was approved by the Board on 3 June 2025 and will be made available on our website.

By Order of the Board

DIRECTOR

REPSOL RESOURCES UK LIMITED

Date: 6 June 2025

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