

STOREGGA

Modern Slavery & Human Trafficking Statement

*This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and has been approved by the Board of Directors of Storegga Limited (the **Company** or **Storegga**)*

Introduction and Risk Assessment

Storegga considers the risk of modern slavery and human trafficking taking place in its business and supply chains, to be relatively low due to the sector in which it operates. Nonetheless, at Storegga, we have a zero-tolerance approach to modern slavery and human trafficking across all areas of our organisation, as well as in our supply chains. We are committed to ensuring we are not connected to modern slavery or human trafficking in any way.

About Storegga

Storegga is an independent developer of low carbon solutions, including carbon capture, storage and hydrogen projects in the United Kingdom and internationally.

Further information about the Company can be found at www.storegga.earth/

Internal Governance

Storegga has the following processes in place to safeguard against slavery and human trafficking in its own business:

1. *Code of Conduct*: Storegga's commitment to combating modern slavery and human trafficking is set out in its Code of Conduct, which all personnel are required to follow. In support of this, the Company has an Anti-Slavery & Human Trafficking and Human Rights Policy, which has been rolled out to all staff to formalise the principle-based approach adopted. In addition, all staff are required to carry out online training focused on tackling modern slavery in the workplace.
2. *Whistleblowing Policy*: All personnel are supported in taking action to avoid any activity that might lead to, or suggest, a breach of this statement. Personnel are encouraged to raise concerns about any issue or suspicion of modern slavery or human trafficking in any part of our organisation or supply chain, in line with the Company's Whistleblowing Policy. We encourage all employees and contract personnel to report any suspicion of slavery or human trafficking without fear of retaliation.
3. *Training and Recruitment*: Storegga requires all personnel to complete compliance training. Further, we conduct our business through our high-quality staff and as such we have robust recruitment practices supported by representatives in our Human Resources team. Checks include requiring evidence to support candidates' 'right to work'. This close involvement and oversight limits the risk of employing anyone who is forced or trafficked labour.

Supply Chain and Due Diligence

We are committed as an organisation to tackling modern slavery and human trafficking and want to work with suppliers and business partners who share our values. We work in partnership with all our contractors, suppliers and other business partners and we aim to leverage those collaborative relationships to ensure that they share and work towards our opposition to slavery and human trafficking.

We have a Third Parties Policy in place which includes an onboarding process to be carried out on all third parties prior to engagement, including new suppliers and business partners. As a minimum, all third parties are screened using the Dun & Bradstreet “Onboard” tool, the results of which are checked by the Company’s legal, finance and procurement teams. A risk assessment is then carried out to determine whether the proposed transaction is affected by any warning signs or “red flags” which would require additional due diligence to be carried out.

Where additional due diligence is required, the next level requires the completion of a due diligence questionnaire, which includes a specific section on commitment to anti-modern slavery and human rights and is reviewed by the Company’s Compliance Officer. Enhanced due diligence may also be carried out on third parties by a third-party provider where considered necessary by the Company’s Compliance Officer.

Further Steps

Storegga is committed to improving its practices to combat modern slavery and human trafficking. We will continue to review the steps being taken to combat modern slavery and human trafficking in our business and supply chains and to make improvements where necessary.

This statement was reviewed and approved by the Company’s board of directors on 12 February 2026.

Signed



Tim Stedman

Chief Executive Officer