



ADURA MODERN SLAVERY

This Modern Slavery Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 on behalf of Adura Energy Limited and its subsidiaries, Adura Operations Limited and UK North Sea Limited (together, the “**Adura Group**”). It covers the period up to and including 30 November 2025.

Ownership context and scope

Adura is an incorporated joint venture owned 50/50 by Shell U.K. Limited (“**Shell**”) and Equinor UK Limited (“**Equinor**”), formed on 1 December 2025. Prior to 1 December 2025, Adura Energy Limited and Adura Operations Limited were wholly owned subsidiaries of Equinor, and UK North Sea Limited was a wholly owned subsidiary of Shell.

In preparing this statement, we have had regard to the frameworks, controls, compliance processes and supply-chain risk management approaches in place under prior ownership up to 1 December 2025. During the reporting period (i.e. prior to 1 December 2025), the entities that now make up the Adura Group operated separately under the ownership of Shell and Equinor. We refer to the respective 2025 modern slavery statements of Shell and Equinor (which are expected to be published in 2026 and, once published, available on their respective websites).

Activities during 2025

Adura is an oil and gas exploration and production company headquartered in Aberdeen with operations (including joint ventures) in the UK.

During the period up to 30 November 2025, supply-chain activities were largely limited to novations (including extensions) of existing contracts and interests from Shell and/or Equinor group entities to the Adura Group. Given this limited level of activity, no material modern slavery risks were identified during the reporting period.

Prior to the change of ownership on 1 December 2025, the applicable Shell and Equinor standards and controls continued to apply, including their respective codes of conduct, business principles, relevant policies, management controls and performance monitoring mechanisms. These standards have informed our approach while the Adura Group completes its own governance build-out.

Transition and forward look

The Adura Group maintains a zero-tolerance approach to modern slavery and human trafficking and is committed to ensuring that there is no modern slavery in its business or supply chain, reflecting the policies of its owners, Shell and Equinor. From 1 December

2025, while maintaining the standards and policies of Shell and Equinor during the transitional period, Adura has been implementing its own governance and risk-management framework, articulated through the Adura Code of Conduct. This reflects respect for internationally recognised human rights and alignment with the UN Guiding Principles on Business and Human Rights, including risk-based due diligence and appropriate prevention, mitigation and remediation measures. Adura expects suppliers and business partners to meet equivalent standards.

Future statements will report on Adura's modern slavery programme for full reporting periods under Adura ownership, including developments in policy, training, supplier due diligence and remediation.

Approval

Adura's Modern Slavery Statement has been approved by the Adura Energy Limited Board of Directors on 24 March 2026.

For and on behalf of Adura Energy Limited and its subsidiaries

A handwritten signature in black ink, appearing to read 'Neil McCulloch', written in a cursive style.

Neil McCulloch, Chief Executive Officer, 26 March 2026

This statement covers the following subsidiary companies:

Adura Operations Limited, UK North Sea Limited