



Modern Slavery and Human Trafficking Statement 2025

ITHACA ENERGY PLC



In this report

About this statement	2
About Us	3
Policies & Procedures	3
Our Code of Conduct	4
Speak Up	5
Risk Assessment Approach	6
Training	7
Next Steps	7

Confirmation Statement

This statement has been approved by the Ithaca Energy plc Board, in compliance with the UK Modern Slavery Act 2015.

Luciano Vasques

Chief Executive Officer, 1 April 2026



About this statement

This statement relates to the financial year ending 31 December 2025. It is published by Ithaca Energy plc and its relevant subsidiaries and affiliates (“Ithaca Energy”) in compliance with section 54(1) of the UK Modern Slavery Act 2015. The statement sets out the steps that the Company has taken and is continuing to take to ensure that modern slavery and/or human trafficking is not taking place within our business or supply chains.

Modern slavery encompasses slavery, servitude, forced and compulsory labour, and human trafficking. Ithaca Energy has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our business or supply chains.

Resources

 [Access our Code of Conduct](#)

 [Access our Annual Report and Accounts](#)



About Us

Ithaca Energy is a leading independent oil and gas development and production company operating on the United Kingdom Continental Shelf ("UKCS"). Ithaca Energy assets include producing oil fields and a portfolio of prospects and discoveries.

Founded in 2004, Ithaca Energy has been on a rapid growth trajectory in the last five years, following a series of transformational M&A transactions and the Group's Business Combination with Eni UK (completed October 2024), creating a dynamic growth player with operations of significant scale and longevity. Ithaca Energy is one of the largest oil and gas operators in the UKCS by production and resources.

Policies and Procedures

Our policies and procedures set out our expectations and requirements for all our colleagues, partners and suppliers, with respect to human rights and modern slavery. They are reviewed on a regular basis and updated where necessary.

Ithaca Energy mitigates the risk of human rights abuses and modern slavery through key policies and procedures, including the Code of Conduct, the Modern Slavery and Human Trafficking Policy, the Bullying and Harassment Policy, and the Diversity, Equity and Inclusion Policy.

Our Code of Conduct

Everyone is required to follow Ithaca Energy's [Code of Conduct](#) which serves as a compass to guide our actions and interactions, ensuring that we conduct our business responsibly and with respect for all our stakeholders.

The Code of Conduct is designed to foster a culture of openness, trust and respect, providing clear guidelines for what is expected from each of our employees, covering the areas of People and Community; Business Integrity and Reputation; and Information and Assets.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies are underpinned by our vision, values and behaviour and apply to all Ithaca Energy employees (including secondees, agency and contract personnel) and directors.

Employees are required to report any concerns regarding modern slavery and/or human trafficking in our business or supply chains.



Speak Up

Our Whistleblowing Policy is designed to encourage our senior managers, officers, directors, employees, consultants, contractors and all persons associated with us to report any behaviour which they feel is not right, whether this affects them personally, or a colleague, or the safety or compliance of the business.

We encourage a speak up culture so that employees can raise concerns in good faith without fear of reprisals. Any concerns can be reported, anonymously by contacting the **Whistleblower Helpline on 0800 026 0666**, which is maintained by an independent external provider to ensure concerns or issues can be escalated and dealt with effectively, without fear of victimisation, discrimination or disadvantage, in the interests of the business, colleagues, shareholders and other stakeholders.

We address failures by our employees to adhere to our policies, and this may involve disciplinary action, up to and including dismissal for misconduct or gross misconduct. We expect all of our suppliers and contractors to act consistently with applicable laws, rules and regulations of any governmental or regulatory body, which includes those relating to modern slavery.

Risk Assessment Approach

Ithaca Energy recognises that the risk of modern slavery and human trafficking within its operations and supply chains is relatively low, given the jurisdictions and sector in which it operates.

However, Ithaca Energy maintains a zero-tolerance approach to modern slavery and expects all service providers, suppliers, vendors, and business partners to uphold high ethical standards across their organisations and supply chains. This commitment is embedded in our Code of Conduct, which promotes integrity in all business relationships and requires robust systems and controls to prevent slavery and human trafficking wherever possible.

In 2026, we will introduce an enhanced risk assessment and due diligence framework to deepen our understanding of potential risks and strengthen our processes to mitigate any identified vulnerabilities.



Training

Training on our policies forms part of the induction process for new employees and regular training is provided thereafter as necessary. If any employee is in doubt whether a particular act or working condition contravenes any aspect of the policies, they are encouraged to seek guidance from a line manager or any member of the legal department.

Next Steps

Ithaca will regularly review the measures we have in place to identify and prevent the risk of modern slavery within our business and supply chain. We recognise that our approach in this area will continue to develop over time.



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Further Reading

 www.ithacaenergy.com

✓ [Code of Conduct](#)

 [Access our Annual Report and Accounts](#)

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