
Modern Slavery and Human Trafficking Statement 2024

This statement (this **Statement**) is made in compliance with section 54 of the UK Modern Slavery Act 2015.

Pharos Energy plc (**Pharos**) is an international energy company. Pharos is registered and domiciled in England and its registered office is in London. The shares of Pharos are publicly listed and traded on the premium segment of the main market of the London Stock Exchange. Pharos has oil and gas exploration, field development and production interests in Vietnam and Egypt. Pharos has a number of direct and indirect subsidiaries (together with Pharos, the **Group**).

Organisation

Pharos is a relatively small organisation with a total workforce of around 35 employees, based at the Pharos offices in the UK, Egypt and Vietnam. The Group expects to close its small satellite office in the United States of America during 2024.

In Vietnam, the Hoang Long and Hoan Vu Joint Operating Companies (the **Vietnam JOCs**), are the designated operators of the Group's interests in the Cuu Long Basin, offshore Vietnam and they directly employ their own workforce. However, under the governance arrangements in place for the Vietnam JOCs, the Group will second its own employees to certain positions within the Vietnam JOCs' management.

The Group directly operates the exploration Blocks 125 and 126 through its subsidiary SOCO Exploration (Vietnam) Limited (**SEVL**).

In Egypt, the Group holds a 45% working interest share in the El Fayum and North Beni Suef Concessions in the Western Desert. Both Concessions are operated through Petrosilah, a 50/50 joint stock company between the contractor parties (being IPR Lake Qarun Petroleum Company (**IPR**) and Pharos El Fayum) and the Egyptian General Petroleum Corporation (**EGPC**). As between the two contractor parties, IPR is the operator under the joint operating agreement for each Concession.

Pharos engages only reputable firms, vendors and consultants (collectively **service providers**). Every service provider must undergo stringent due diligence before any contract is awarded. This due diligence comprises an initial questionnaire, which addresses all aspects of the service provider's business including their position on modern slavery and human trafficking. Where the service provider does not have their own policy on the matter we will share ours and require compliance to the terms of the Group's policy. Standard form contracts with service providers also contain prohibitions and undertakings on modern slavery and human trafficking and other provisions intended to give effect to Group policy on the issue.

For 2024, in Egypt, Pharos continues to follow a strategy with IPR and Petrosilah to incorporate such provisions into contracts awarded by the joint venture and to ensure that tender documentation includes queries on modern slavery and human trafficking.

In Vietnam SEVL will implement Group policy and procedures to combat modern slavery and human trafficking directly in operations on Blocks 125 and 126. In relation to operations on Block 9-2 (CNV field) and Block 16-1 (TGT field), the Group will continue to monitor JOC contracts and tenders and ensure that where possible in the JOCs the Group's policies on modern slavery and human trafficking are promoted and reflected in day-to-day operations.

Statement

Pharos fully supports and demonstrates compliance with the Modern Slavery Act 2015. This statement is supported by the Group Code of Business Conduct and Ethics and the Group Human Rights Policy, each of which was revised and approved by the Pharos Board of Directors in March 2024.

Pharos opposes the crime of slavery in all of its forms, including child labour, servitude, forced or compulsory labour and human trafficking.

The Pharos Health, Safety and Environmental Management System sets out the company's internal control mechanisms for implementing policy and how breaches or potential breaches are addressed and investigated.

All Group employees have access to a confidential, anonymous and independent whistleblowing hotline, which is underpinned by the Group's Whistleblowing Policy available with this Statement on the Pharos website. This line may be used to report any incidents or perceived instances of concern which may include slavery or human trafficking.

In addition to this Statement, Pharos's primary policies for preventing slavery from occurring in any part of its own business or in any of our supply chains are contained in the Code of Business Conduct and Ethics and the Human Rights Policy.

The principal procedures and mechanisms for implementing the Group's policies on modern slavery and human trafficking are as follows:

- Code of Business Conduct and Ethics
- Human Rights Policy
- Onboarding Policy for New Business Partners
- Supply Chain Management Procedure
- Contractor Pre-qualification Due Diligence procedures
- Whistleblowing Policy and confidential anonymous hotline
- Corporate and Project Level Grievance procedures

Prevention of modern slavery and human trafficking were a key consideration in the development and implementation of the Group's Contractor Pre-qualification Due Diligence procedures. This is supplemented by independent verification and the generation of 'red flag' reports. If a 'red flag' is identified, the Group Risk Manager meets with the Chief Financial Officer and General Counsel to discuss the service provider, assess the risk and determine whether additional due diligence reporting should be commissioned. Existing service providers are monitored for compliance.

Considerable engagement is undertaken to raise awareness of the issue and to ensure that any queries or concerns may be raised with any member of the senior management team.

Pharos currently assesses the risk of slavery and human trafficking in any part of its business is low. It is acknowledged that the principal requirements of technical and professional qualifications, experience and expertise for corporate and operational roles do make an impact on the risk level. The risk in the supply chain is also currently assessed as a low risk, stringent service provider due diligence with a consistent approach is considered to be appropriate mitigation.

Approval

This Statement is made in accordance with section 54 of the Modern Slavery Act 2015 and will be published on the Pharos website in accordance with that section. This Statement was approved by the Board of Directors on 21 March 2024.

A handwritten signature in black ink, appearing to read 'Jann Brown', with a stylized, cursive style.

Jann Brown

Chief Executive Officer

21 March 2024