# Star Energy Group plc ("Star Energy") – Modern Slavery Transparency Statement

This statement, relating to the financial year ending 31 December 2024, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the approach which Star Energy and its subsidiaries (together the "Star Energy Group") have taken to understand modern slavery risks related to our business and mitigate such risks.

#### Modern slavery

Modern slavery is a crime and a gross violation of fundamental human rights. The Star Energy Group is fully committed to preventing slavery and human trafficking in our corporate activities. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

Our business, Star Energy is a UK Listed (Alternative Investment Market) business that produces and explores for hydrocarbons and deep geothermal heat onshore in the UK; which we consider to be low risk in relation to modern slavery. The Star Energy Group holds a portfolio of production and exploration assets focused on the East Midlands and Weald Basin in England employing c. 119 people. In Croatia, Star Energy has a 71% interest in a geothermal development business.

### **Star Energy Group companies:**

As at 31 December 2024 the Star Energy Group comprised:

Companies registered in the UK:

- Star Energy Group plc
- Island Gas Limited
- Island Gas Operations Limited
- IGas Energy Enterprise Limited
- IGas Energy Limited
- Star Energy Limited
- Star Energy Weald Basin Limited
- Island Gas (Singleton) Limited
- Dart Energy (Europe) Limited
- Dart Energy (East England) Limited
- Dart Energy (West England) Limited
- IGas Energy Development Limited
- IGas Energy Production Limited
- Greenpark Energy Transportation Limited\*
- GT Energy UK Limited
- GT Energy Croatia Limited
- A14 Energy Limited\*\*

# Companies registered in Croatia:

- IGeoPen d.o.o. za trgovinu i usluge\*\*
- \* struck off the register of companies in June 2025
- \*\* Star Energy held a 51% interest, which has since increased to 71% in January 2025

## Our supply chains

The Star Energy Group direct supply chain supports our operations. Star Energy recognises its responsibility with regards to supplier selection and has alerted relevant staff to the risks of slavery, however small, in their businesses and across the wider supply chain. Those staff are expected and encouraged to report concerns to management, who will then act upon them.

# Risk assessment and due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk, we have in place systems to:

- include anti-slavery checks in the due diligence process for on-boarding new suppliers;
- monitor potential risk areas in our supply chains;
- conduct selective supplier audits; and
- include due diligence regarding anti-slavery in any M&A activity.

### **Training and policies**

To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking across our businesses, Star Energy intends to conduct further training for relevant members of staff and has formulated a stand-alone "Anti-slavery and Human Trafficking Policy" which all staff are required to read and acknowledge as a supplement to existing company policies on corporate governance and whistleblowing.

This statement was approved by the board of directors of Star Energy on 19 June 2025.

For and on behalf of Star Energy Group plc

Philip Jackson
Non-executive Chairman