

Modern Slavery and Human Trafficking Statement

INTRODUCTION

Gamma Energy LTD makes the following statement under Section 54 of the UK Modern Slavery Act 2015 (MSA), setting out the measures taken to ensure a fair and ethical working environment, thereby preventing modern slavery and human trafficking both within Gamma Energy LTD and in our Group's supply chain. This statement sets out the steps we have taken in 2026 to understand potential modern slavery risks within our business structure and supply chain, as well as the steps taken to eradicate these risks.

ABOUT US

Gamma Energy LTD develops different projects at a global level to help companies and public administrations with innovative solutions and services; with a firm commitment to make a positive impact on our lives and that of our planet by helping to fight against CO2 emissions.

Gamma Energy LTD is committed to free choice of work, with slavery, bonded labour, sexual exploitation, criminal exploitation domestic servitude and human trafficking being totally unacceptable and outside of our internal Code of Ethics, which outlines our commitment to the protection of people and the vigilance necessary to prevent the above practices from occurring in any area of our corporate activity to the best of our ability.

This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third party representatives and business partners.

There are no known issues of modern slavery in our business or in our supply chain.

POLICIES AND MANAGEMENT FRAMEWORK

Gamma Energy LTD has developed a compliance system that includes requirements for suppliers that reflect our commitment to human rights and the fight against modern slavery. Our internal system ensures that any allegations of violations of these policies are dealt with quickly and effectively.

- *Ethical code
- *Disciplinary regime
- * Compliance Policy
- * Tax Compliance and Fraud Prevention Policy
- * Human Rights Policy
- * Competition Policy
- * Social Media Use Policy
- * Conflicts of Interest Policy

* Internal Information System Policy

Where Gamma Energy LTD uses its own contractual templates, contracts with suppliers and collaborators include clauses referring to the Company's Code of Ethics and applicable compliance policies.

Gamma Energy LTD hopes to identify and mitigate the risks of modern slavery throughout our supply chain by complying with the UK Modern Slavery Act and being guided by any other applicable laws, international agreements or internal codes. Our internal system, together with the Management Committee, ensures that any allegations of violations of these policies are dealt with quickly and effectively.

OUR SUPPLY CHAIN

Gamma Energy LTD is working to ensure that contractors, subcontractors and suppliers forming part of its supply chain are aware of and comply with its Code of Ethics and applicable compliance requirements. Where Gamma Energy LTD uses its own contractual templates, these requirements are incorporated through specific contractual clauses. In addition, suppliers are subject to the Company's usual assessment and qualification processes, including the collection and review of relevant certifications, such as applicable ISO certifications.

Supplier assessment and qualification processes are already applied in relation to quality and environmental requirements and have provided an established framework for monitoring supplier compliance. This existing framework may also support the progressive integration of relevant compliance and modern slavery considerations into supplier assessment processes.

GUIDELINES IN ACTION

Gamma Energy LTD recognises the continuing evolution of modern slavery, and we are committed to:

- **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide the following to staff:

- Provide employees with access to information, awareness materials and relevant guidance on modern slavery and human trafficking
- Provide awareness materials and guidance to employees on modern slavery and human trafficking and reinforce these principles through the Company's broader compliance training and communication activities
- Where applicable, review relevant suppliers, contractors and subcontractors to verify whether they are required to publish a Modern Slavery Statement and whether such statement is publicly available.

- **REPORTING**

All incidents that may be reported are committed Gamma Energy LTD to be fully investigated and any necessary action taken promptly and effectively.

If, following support and guidance to remediate any identified issue, any contractor, subcontractor, supplier or vendor violates this statement, or wilfully, knowingly or negligently allows such violations, Gamma Energy LTD will review its commercial relationship with that organisation and may take appropriate contractual or commercial action, including termination of the relationship where permitted under the applicable contract.

Employees are required to avoid any activity that might lead to, or suggest, a breach of this statement. Any suspected breach by an employee will be investigated in accordance with the Company's applicable policies and procedures and, where substantiated, may result in disciplinary action, up to and including dismissal where appropriate. Any disciplinary action will be managed in accordance with the Company's applicable disciplinary procedures and policies.

- **REVIEW 2025-2026**

Assessment of effectiveness since the previous review, during which Gamma Energy LTD has found no evidence of slavery or human trafficking within its supply chains and continues working to prevent such practices

- Review of the validity of the policies that make up the organization's compliance.
- Availability of informational materials on human trafficking and modern slavery for all employees.
- Inclusion on UK websites of access to the organisation's whistleblowing channel, code of ethics and compliance policy.
- Adhesion to the UN Global Compact and and public support for the 10 principles of the global compact.
- Reviewed relevant active suppliers to identify those required to publish a Modern Slavery Statement and verified the availability of such statements on their websites, where applicable

- **INCIDENTS INVESTIGATED**

Since the last review, no incidents have been reported within our supply chain.

- **FURTHER STEPS (Next revision 2026-2027)**

During the next reporting period, the company will continue reviewing its supply chain practices and strengthen its supplier due diligence processes in relation to relevant modern slavery risks.

- Periodic review of policies, verifying their validity and updating them when necessary.
- Renewal of adherence to the UN Global Compact.
- Inclusion of compliance with this statement in the Non-Financial Reporting.
- Continue reviewing relevant suppliers to identify those required to publish a Modern Slavery Statement and monitor the availability of such statements where applicable. In addition, develop a process to communicate Gamma EnergyLTD's Modern Slavery Statement and relevant compliance expectations to selected suppliers, where appropriate.

-Continue making modern slavery awareness materials and relevant compliance guidance available to employees, including new joiners.

-Continue the Company's organisational compliance training programme and progressively incorporate relevant modern slavery awareness content where appropriate.

This slavery and human trafficking statement is made for the financial year ending 2026. It was approved by the board on 30/06/26.

A handwritten signature in blue ink, appearing to be "J. Zorrilla", written in a cursive style.

GAMMA ENERGY LTD PRESIDENT

JOSE MANUEL ZORRILLA ASTUDILLO