

## **CORNISH METALS INC.**

**For the avoidance of doubt  
this Policy applies to South Crofty Ltd., an indirect subsidiary of Cornish Metals Inc.**

### **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

#### **1. Purpose of this Policy**

Cornish Metals Inc. and its subsidiaries (the “**Group**”) are committed to conducting business ethically and with integrity and recognise that modern slavery is a crime and a violation of fundamental human rights. The purpose of this Anti-slavery and Human Trafficking Policy (the “**Policy**”) is to convey the Group’s position on modern slavery and human trafficking.

#### **2. Who does this Policy apply to?**

This Policy applies to all directors, officers and employees of the Group (“**Personnel**”). Policy awareness training forms part of the induction process for new Personnel and all existing Personnel receive training on how to comply with this Policy.

This Policy is available to all interested parties through the Company’s website. We will inform consultants, contractors and other business partners about this Policy and share our expectations that they will observe and uphold our position on modern slavery and human trafficking when performing work on our behalf.

#### **3. Responsibility for this Policy**

While the Board of directors has overall responsibility for this Policy, the Chief Financial Officer (CFO) is responsible for the implementation and monitoring of the Policy. Furthermore, all Personnel are responsible and accountable in their role to ensure that the aims of this Policy are met and have an obligation to bring any identified issues forward to management for resolution.

#### **4. Policy commitment**

Modern slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain. The Group’s management team has a zero-tolerance approach to modern slavery and is committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place in our own business.

We expect the same high standards from our contractors, suppliers and other business partners and we expect that our business partners will hold their business partners to the same standards.

#### **5. Guiding principles**

We have defined the following guiding principles to underpin our approach to integrating anti-slavery initiatives into our business activities:

- (a) Comply with applicable laws and regulations in all jurisdictions where the Group operates, including the UK Modern Slavery Act 2015;

- (b) Implement effective systems and controls for preventing and detecting modern slavery within the Group's business;
- (c) Provide information to our Personnel on how to identify and report concerns regarding modern slavery and human trafficking in both the Group's business and that of our business partners;
- (d) Take effective action in the event of the detection of, or suspicion of, modern slavery within the Group's business;
- (e) Encourage openness and support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken;
- (f) Ensure no one suffers any detrimental treatment (such as dismissal, disciplinary action or threats) as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of our own business or our business partners' business; and
- (g) Encourage our key contractors to implement systems and controls for detecting modern slavery within their businesses.

## **6. Review**

This Policy will be updated over time to maintain alignment with the Group's evolving sustainability programme. As such, the Board shall review this Policy annually, at a minimum, and make changes as required.

**First approved by the Board of Directors of Cornish Metals Inc. on 13 December 2023.**

**Reviewed and approved by the Board of Directors of Cornish Metals Inc. on 12 March 2025.**