

Modern Slavery Act – Financial Year 2024

Policy and Statement

This statement sets out the steps that Bornmore Metals Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Bornmore Metals has a zero tolerance approach to any form of modern slavery, forced labour and human trafficking. We are committed to acting ethically and with integrity in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business.

We are also committed to ensuring there is transparency in our own supply chain and we instruct all our suppliers to comply with the standards we set as a company, to eradicate modern slavery and commit to the highest level of ethical standards in the management of its activities.

Our Policies

We operate the following policies that assist our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

Whistleblowing Policy - we encourage all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature. Our policy includes specific guidance for employees on how to recognise signs of abuse, including slavery, human trafficking, forced labour and how to respond to and escalate any concerns.

Business Ethics Policy - our policy sets out the core values which we expect to be observed throughout the Company.

Supplier Agreement - we are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Furthermore, we expect our suppliers to provide the relevant supportive evidence to justify their statements. We have systems in place to:

- Identify and assess potential risk areas in our supply chain
- Mitigate the risk of slavery and human trafficking occurring in our supply chain
- Monitor potential risk areas in our supply chain

We require all our suppliers to confirm their continued compliance on the above on an annual basis and inform us immediately when there is a change in circumstances. Serious violations of Bornmore Metals' Supplier Agreement will lead to the termination of the business relationship.

For new suppliers wishing to work with Bornmore Metals, we issue a Pre-Qualifications Questionnaire which includes questions specifically targeted at slavery and human trafficking risk.

Risk Assessment:

During the next financial year we will commence a review exercise of this policy against our activities to establish whether the approach we have taken follows emerging best practice by:

- Assessing and interpreting any recent or emerging case law and best practice
- Benchmarking our activities against statements and action plans undertaken by similar organisations
- Re-evaluating the risk of non-compliance as part of our compliance risk register assessment

Board Approval

Bornmore Metals have agreed management responsibility for this policy and statement from our Senior Management Team and Board of Directors, and raised general organisational awareness by circulating an article to all staff explaining progress in preparing this statement.

Bornmore Metals requires all employees working in supply chain management and relevant roles to complete training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking, and what should be done if this activity is suspected.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Bornmore Metals' slavery and human trafficking statement for the financial year ending 31st December 2024.

Ian Griffiths

Chief Executive Officer
Bornmore Metals Ltd.
January 2024