

Sierra Mineral Holdings I, Limited (SMHL) Modern Slavery Policy

8th January 2024

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1. Introduction

Sierra Mineral Holdings I, Limited (“**SMHL**”) recognizes the profound responsibility it bears in fostering ethical business practices, particularly in preventing modern slavery and human trafficking within our operations and supply chains. Our commitment to integrity and ethical conduct extends to every facet of our organization, and we actively strive to implement robust systems and controls to eradicate the presence of modern slavery.

2. Policy Statement

SMHL acknowledges the gravity of modern slavery and affirms its dedication to complying with the UK Modern Slavery Act 2015, Sierra Leone Anti-human Trafficking and Migrant Smuggling Act 2022 and other applicable legislation.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy 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, agents, contractors, external consultants, third-party representatives and business partners. This policy **does not form part of any employee’s** contract of employment and we may amend it at any time.

3. Our Business

As an organization operating in Sierra Leone, SMHL recognizes the imperative to adopt a stringent stance against slavery and human trafficking within our sphere of influence.

4. Our Supply Chains

SMHL stands unwavering in its commitment to ensuring slavery and human trafficking find no place within our supply chains. We are resolute in the implementation and enforcement of effective systems and controls to safeguard against any such violations.

5. Due Diligence Processes

SMHL conducts thorough due diligence when onboarding new suppliers and other business partners, and we consistently review existing ones. This process includes a comprehensive evaluation of their compliance with our values and policies, including this Modern Slavery Policy.

6. Risk Assessment and Management

As SMHL operates in Sierra Leone and internationally, we have identified that we do have a potential exposure to risk. However, our Modern Slavery Policy and policies around recruitment, safeguarding and procurement ensures that we have effective controls in place. **Staff are encouraged to ‘speak up’ through our whistleblowing and confidentiality policies.**

To manage this risk, we will work with suppliers and contractors to acknowledge our commitment to combat slavery by inserting relevant clauses into our contracts and agreements.

7. Training and Awareness

SMHL is committed to fostering awareness among our employees and key individuals. This policy forms part of the induction training of new employees in our company. Through comprehensive training programs, we aim to equip our workforce with the knowledge and tools necessary to identify and prevent instances of modern

slavery.

8. Reporting Concerns

SMHL actively encourages employees to report any concerns related to slavery or human trafficking. We assure employees that all reported concerns will be thoroughly investigated by management, and appropriate action will be taken.

9. Communication and Review

This policy will be communicated extensively to all employees, suppliers, and stakeholders. A commitment to regular review, at least annually, ensures the policy's relevance and effectiveness, with updates implemented as needed. Employees can also pick up a copy of this policy from our HR Department.

10. Compliance

SMHL is unwavering in its commitment to compliance with all relevant legislation and regulations concerning modern slavery in Sierra Leone including the Anti-human Trafficking and Migrant Smuggling Act 2022. As our operations also involve in international trade, SMHL is also committed to complying with not only local legislations but also internationally recognized standards on anti-slavery.

11. Monitoring, Review and Performance Information

The monitoring and effectiveness of this policy will be managed by the SMHL appointed Compliance Officer in collaboration with the HR Manager and head of procurement:

- Recording and monitoring any incidents or reports made to us which conflict with our values.
- Treating all reports and incidents in line with our confidentiality policy.
- Reviewing and strengthening our centralised procurement processes and policy, taking into account a range of risks, including slavery and human trafficking.

Signed and approved by the Board of Directors of SMHL

DATED 8th DAY OF JANUARY 2024



Albert Gulama
Chairman
Board of Directors