

Concord Resources Limited

2025 United Kingdom: Modern Slavery Statement

Background

This statement is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (the "Act") and constitutes Concord Resources Limited ("Concord")'s modern slavery and human trafficking statement, as required by the Act, for the financial year ended 31 December 2025.

Scope

Concord is a company incorporated in England and Wales. As a result, to the extent it carries on business (or part of a business) in the UK, it may fall within the scope of the Act.

Our Structure and Business

Concord is a commodity merchant trader with a focus on non-ferrous metals and associated minerals and raw materials. Concord is the main trading entity of the Concord Group and it both sources and delivers commodities, predominantly in developed markets. The products that Concord trades, finances, moves and stores are relevant to many important global industries ranging from automobiles, aerospace, electronics, construction, consumer products and infrastructure.

Concord's Approach

Concord has a zero-tolerance approach to modern slavery and human trafficking and is committed to acting ethically, with integrity in all its business practices and ensuring that its operations and supply chains are free from any form of modern slavery or human trafficking.

Due Diligence Risk Assessment

Concord undertakes deep due diligence processes in screening its counterparties via a "know your customer" ("KYC") on-boarding process, prior to commercially engaging with them (as well as updating such information from time to time). The KYC process includes identifying specific fields relating to whether the counterparty has its own supply chain policy, whether such policy is in line with Concord's anti-slavery policies and whether the counterparty is audited for compliance with its supply chain policy. All counterparties are also screened through public database searches and categorised using a risk-based approach (which incorporates, amongst other factors, country of incorporation and countries of operation as a component). Concord seeks to ensure that all of its supply chain counterparties share at least a comparable or an equivalent commitment to a transparent, ethical and responsible supply chain.

Commitment to our People

Concord is committed to maintaining a fair workplace in all of its business operations for all employees, regardless of gender, age, race or sexual orientation. Discrimination of any kind is strictly prohibited and Concord advocates advancement based on meritocracy.

Counterparty and Supplier Adherence

When dealing with suppliers and counterparties which have passed its KYC process, Concord is increasingly signing bilateral "Code of Conduct Compliance" documents with its counterparties, which often include specific declarations made about actions that Concord (and Concord's counterparties) take to help ensure the prevention of slavery in all its guises and typically, at a minimum, compliance with the principles of the UN Global Compact.

Training and Whistleblowing

All relevant employees are required to be familiar with and comply with Concord's position on modern slavery and human trafficking. Employees are encouraged to be vigilant and aware in their dealings with counterparts and are periodically trained in relation to these issues. Any reports are thoroughly investigated and appropriate actions are taken where relevant.

Concord maintains a whistleblowing processes whereby employees are able to report (without fear of reprisal) internally and/or to a third party, any concerns about modern slavery. Reports are thoroughly investigated, and appropriate actions are and will continue to be taken.

Future Steps

Moving forward:

1. Concord will continue to collaborate with customers, financiers and suppliers through all levels of its operations to improve practices and awareness of the modern slavery risks.
2. Concord will continue to utilise existing (and where possible, improve) KYC checks and technology to enhance the quality of counterpart screening before onboarding for business dealings.
3. Concord will continue to reinforce messaging to all new and existing employees and agents of its commitment to ethical practices and to remain vigilant and recognise such malpractices in all of its operations, so that instances are reported and appropriately dealt with.

Communication

Copies of our Modern Slavery Statements are published on Concord's global website and on the UK Modern Slavery Statement Register.

Approved by the Board of Directors for the year ended 31 December 2025