Concord Resources International Minerals Limited

2022 United Kingdom: Modern Slavery Act Statement

Background
This statement is made pursuant to section 54 of the United Kingdom Modern Slavery Act 2015 (the "**Act**") and constitutes the modern slavery and human trafficking statement of Concord Resources International Minerals Limited ("**CRIML**"), as required by the Act, for the financial year ended 31 December 2022.

Scope
CRIML is 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
CRIML is an industrial investment entity. CRIML is 100% owned by Concord Resources Holdings Limited. CRIML's controlled subsidiaries include the Atlantic Alumina Company ("**Atalco**") which is the only alumina producer in the USA as well as Discovery Bauxite Partners ("**Discovery**"), the only bauxite exporter in Jamaica. CRIML also has a 50% interest in Clear Sky Limited ("**Clear Sky**"), a company incorporated in England & Wales, which invests in carbon offset projects in order to create access to a long-term supply of carbon inventory to facilitate customer business, trade for its own account and to support a carbon inventory distribution business.

Our approach
CRIML supports the Act which aims to assist eradicating modern slavery, wherever it may occur, and raise public awareness of the modern slavery problem. CRIML has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in its business dealings and relationships throughout the world and to implementing controls to safeguard against modern slavery taking place within its business or supply chains.

Due Diligence Process in relation to slavery and trafficking in our business and supply chains
CRIML is committed to achieving the highest standards of ethical behaviours in the conduct of its business and activities worldwide.

- ClearSky's due diligence processes involve screening its counterparties via a "know your customer" ("**KYC**") on-boarding process prior to trading. The KYC process includes identifying specific fields relating to whether the counterparty has its own supply chain policy in place and whether the counterparty is audited for compliance with its supply chain policy. Clear Sky also performs an information search for each counterparty to assess and analyse any press regarding the counterparty, including its supply chain issues. All counterparties are then screened through public database searches and categorised using a risk-based approach (which incorporates countries of operation as a component), trying to ensure that Clear Sky's counterparties share the same commitment to a transparent, responsible and legal supply chain.
- Significant parts of Discovery's Jamaican workforce is unionised and the Atalco manufacturing and maintenance employees are unionised. Periodic union negotiations take place under long-established processes.

Commitment to our People
CRIML is dedicated to maintaining a fair workplace for all employees. The recruitment policies of CRIML's various subsidiaries include eligibility checks, equal opportunity and ensuring proper right-to-work status. All employees are paid at least the minimum wage in the relevant jurisdiction.

Training
All Atalco and Discovery employees are required to ensure that they are familiar with and comply with CRIML's position on modern slavery and human trafficking, including via relevant Codes of Conduct and Compliance Policies and Procedures manuals. Employees are encouraged to be vigilant and aware in their dealings with suppliers and consumers and if there are any concerns or indications that there is any potential modern slavery, human trafficking or other human rights (or other) violations, they must notify a member of the management team immediately and before proceeding or continuing with any business activity. Additionally, whistleblowing procedures are in place to be able to report (without fear of reprisal) any concerns about practices in the supply chain or in the general employment, that may not reflect CRIML's legal and moral standards.

Assessment of Effectiveness in Combatting Modern Slavery
Although it is difficult to be absolutely sure, CRIML is confident that the following elements minimise the risk that an instance of modern slavery or trafficking exists within its supply chain:

1. Strong personal relationships with customers and suppliers through all levels of a company are key to CRIML's business. Management and sale/trading teams frequently speak with, and visit, customers to assess and report back on issues that they discover.
2. As detailed above, all new customers and suppliers go through detailed KYC checks before any trading is executed.
3. The requirement that all employees comply with a Code of Conduct no matter where they are located around the world, means that there is a clear understanding at an employee level that CRIML and its subsidiary entities are committed to achieving a slavery and human trafficking free supply chain. Employees are encouraged to speak up if they identify anything concerning anywhere in a supply chain.

Communication
Copies of our Modern Slavery Statements are published at www.concordltd.com and on the UK Modern Slavery Statement Register.

Approved by the Board of Directors on 29 March 2023.
Issued for the year ended 31 December 2022