

# Concord Resources International Minerals Limited

## 2024 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 Concord Resources International Minerals Limited (“**CRIML**”)’s modern slavery and human trafficking statement, as required by the Act, for the financial year ended 31 December 2024.

### 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, 100% owned by Concord Resources Holdings Limited. CRIML’s controlled subsidiaries include the Atlantic Alumina Company, the only alumina producer in the USA, Discovery Bauxite Operations Limited and Discovery Bauxite Partners, the only bauxite exporter in Jamaica. CRIML also has a 50% interest in Clear Sky Limited, a business which, amongst other things, invests in carbon offset projects 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 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 and Risk Assessment

CRIML 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 CRIML’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). CRIML 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

CRIML 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 CRIML advocates advancement based on meritocracy.

### Training and Whistleblowing

All relevant employees are required to be familiar with and comply with CRIML’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.

CRIML 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. CRIML 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. CRIML 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. CRIML 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 on 27 February 2025.  
Issued for the year ended 31 December 2024**