

## **Green Peridot Modern Slavery (Anti-Slavery and Human Trafficking) Policy**

### *PURPOSE*

Modern Slavery is a crime and a fundamental human rights violation. It is the term used to describe human trafficking, slavery and slavery-like practices such as servitude, forced labor and debt bondage.

This Policy is made pursuant to the Modern Slavery Act 2015 in order to limit the risk of modern slavery occurring within Green Peridot's operations or infiltrating its supply chains. It sets out the steps Green Peridot has taken to ensure that slavery or slavery-like practices, forced labour and human trafficking are not taking place in our supply chains or in any part of our business.

The Modern Slavery Act (MSA) 2015 of the United Kingdom covers four key criminal activities which inform this policy:

- Forced and compulsory labour, through physical or mental threat;
- Being owned or controlled by the employer through actual or threatened mental or physical abuse;
- Being treated as a commodity; being bought or sold as property;
- Being moved from one place to another for the purpose of being exploited (human trafficking).

In addition to the above, Green Peridot has a zero tolerance policy against other forms of modern slavery not expressly included in the MSA including but not limited to child labour (which is defined by the International Labour Organization as '*work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development*'). Green Peridot will not condone any occasion of child labour in its operations or its supply chain.

At Green Peridot, we are committed to working ethically and acting transparently and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

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, interns, agents, contractors, external consultants, third-party representatives and business partners and to our third party supply chain, including miners and suppliers, logistic fulfilment centers, procurement vendors and recruitment and employment agencies from whom Green Peridot employees may be sourced.

### *RESPONSIBILITY FOR THE POLICY*

The Board of Directors has overall responsibility for this Policy and in ensuring that the Company complies with all its legal and ethical obligations. Our Legal Department will remain alert to indicators of modern slavery and will respond appropriately if they find or are informed of any indication of modern slavery.

### *COMPLIANCE WITH THE POLICY*

- All employees of Green Peridot are required to read, understand and comply with this Policy.
- Our Agreements with Third parties specifically include prohibitions against slavery or servitude, the use of forced, compulsory or trafficked labour, and the use of child labour in line with this policy.
- All Third parties are also required to hold their own suppliers to the same standards. We also reserve the right to terminate any contractual arrangement if there is breach of this policy.
- All Persons to whom this policy refers are responsible for the prevention, detection and reporting of modern slavery in any part of our business or supply chains. They are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- If any employee or third party believes or suspects a breach of this policy has occurred or that it may occur, such a person must notify the Legal Department or report directly to the Board as soon as possible.
- We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking

place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

#### *SUPPLIER DUE DILIGENCE*

We expect and require all our contractors, suppliers and other business partners to observe zero tolerance for modern slavery and adopt the same high standard as we do to prevent modern slavery, by ensuring all employees and workers are treated with dignity and respect in a fair and ethical environment.

Our procurement process includes vetting of all potential suppliers, with responses being evaluated on the basis of supplier policies and controls. Suppliers will be categorised according to the level of risk posed and an assessment will be made as to whether a plan of action is required to satisfy any gaps. We expect our suppliers to adopt the same principles when contracting with their own suppliers and include this as a requirement in our Agreements with them.

All suppliers will be required to sign a declaration confirming their compliance with the Act and our Policy and to contract on terms which ensure that we can check their adherence to these principles and where appropriate take corrective action.

#### *COMMUNICATION AND AWARENESS OF THIS POLICY*

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary and in any case, in no less than on an annual basis. Our zero-tolerance stance on modern slavery is communicated to all Third parties at the outset of our business relationship with them and reinforced as appropriate thereafter and included in all our Agreements with them.

#### *BREACH OF THIS POLICY*

The breach of this policy by an employee or other officer of the Company may lead to disciplinary action being taken in accordance with the Company's Disciplinary Procedure. Serious breaches may be regarded as gross misconduct and can lead to immediate dismissal.

All colleagues will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

*STATUS OF THIS POLICY*

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy will be reviewed by the Board of Directors on a regular basis. It reflects the Company's current practices. As a Commercial Organization not contemplated under Section 54, Part 6 of the Modern Slavery Act 2015, Green Peridot is NOT required to make a Statement on Slavery and Human Trafficking at the end of each Financial year but has instituted this Policy to support the wider purpose of the Act.