



STRATTON METALS

Stratton Metal Resources Ltd

Anti-Slavery and Human Trafficking Policy Annual Statement 2025 / 2026

Modern Slavery Act 2015

An Act to make provision about slavery, servitude and forced or compulsory labour and about human trafficking, including provision for the protection of victims; to make provision for an Independent Antislavery Commissioner; and for connected purposes. [26th March 2015]

Our statement

We are committed to ensuring transparency to tackle modern slavery both within our business and throughout our supply chains, in accordance with our responsibilities under the Modern Slavery Act 2015.

We expect the same high standards from all of our suppliers and business partners and as part of contractual terms and conditions, we include specific prohibitive measures against the use of slavery, servitude or forced, trafficked or compulsory labour or anyone held in slavery. This covers both adults and children.

Whilst out of our control we expect that all of our suppliers obtain and achieve the same high standards.

All of our employees, agents or contractors are covered by this policy.

Annual statement

We currently have 9 employees. Seven are based in London with one in the Netherlands and one in Austria. All report to the UK based Managing Director.

Separately, we have several agents based around the world and an external IT support contractor. All are subject to our anti-slavery policy.

We trade both nickel and cobalt in its various forms and contract with Producers, LME Brokers, other Traders and individual suppliers.

Our due diligence procedure for vetting new suppliers includes a provision to ask whether or not they have an antislavery policy. In the event they do not, we take an internal view as to the origin, location and providence of the goods being supplied.

We also ensure that no material supplied to us is from artisanal sources.

Our approach to the Modern Slavery act is fluid and we will operate within its guidelines to the best of our knowledge at all times.

Please see page 2 for definitions of:

Slavery and servitude slavery

Forced or compulsory forced labour

Human trafficking

Child Labour

Definition of Slavery and Servitude **Slavery**, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour **Forced or compulsory labour** is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking **An offence of human trafficking** requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here:

Definition of Child Labour **Child labour** is defined by international standards as children below 12 years working in any economic activities, those aged 12 - 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO). The term "child labour" is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed and the objectives pursued by individual countries. Children can be particularly vulnerable to exploitation, but child labour will not always constitute modern slavery. It will still be necessary to determine whether, based on the facts of the case, the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138. Children do have particular vulnerabilities which should be considered when determining whether modern slavery is taking place. The Modern Slavery Act 2015 specifically recognises that it is not necessary for a child to have been forced, threatened or deceived into their situation for it to be defined as exploitation.



John Triston

Director

STRATTON METAL RESOURCES LTD

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