



MMD MODERN SLAVERY POLICY

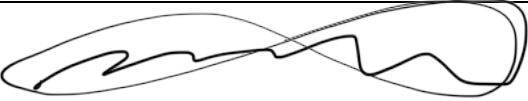
Date:	June 2024
Policy document:	3
Revision:	1.0
Approved by Group MD:	 [signature by Group MD]

Table of Contents

Glossary of definitions.....3

1. Introduction.....4

2. Purpose and Scope.....4

3. Policy Statement.....4

4. Supply Chain Standards.....4

5. Inclusiveness and Diversity.....5

6. Supplier & Customer Due Diligence.....5

7. Due Diligence of Agents.....5

8. Compliance with this Policy.....6

9. Roles and Responsibilities.....6

9.1 MMD Personnel.....6

9.2 The Human Resources Officer.....6

9.3 MMD Board of Directors.....7

10. Deviations from this Policy.....7

Glossary of definitions

For the purposes of this Policy, the table below lists and defines the following terms:

Term	Definition
Child Labour	means work that deprives children of their childhood, their potential, their dignity and that is harmful to their physical and mental development. It includes work that: • is mentally, physically, socially, or morally dangerous and harmful to children; or • interferes with their schooling in any way.
Group Legal	means the MMD Group general legal counsel, for the time being and as appointed from time to time.
Group MD	means the Group Managing Director of the MMD Group, for the time being and as appointed from time to time.
Human Resources Officer	means the person or persons appointed to the head of the human resources department of the respective MMD Entities and/or who is responsible for the administration of employees or other labour related matters within the respective company.
Human Rights	means rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status, such as the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education.
MMD Entity (Entities)	means any MMD company or other legal entity which forms part of the MMD Group.
MMD Group	means the MMD Group of companies including all subsidiaries, holding, and interconnecting companies and/or legal entities in respect of which MMD has control over or any interest in, now or in the future.
MMD Personnel	shall mean all employees (permanent, fixed and temporarily), consultants, contractors, trainees, officers, agents, intermediaries or any other person associated with or acting on behalf of or doing business with any MMD Entity, directly or indirectly and irrespective of nationality.
Modern Slavery	means when an individual is exploited by others for personal or commercial gain, whether tricked, coerced, forced or when they lose their freedom in any way. This includes Child Labour, human trafficking, forced labour and debt bondage.
Policy	means this Modern Slavery policy, as amended from time to time, including any annexures or schedules thereto, whether now or in the future.
Third Party (Parties)	means any person or legal entity who transacts, deals with, or delivers or accepts any services or products from, an MMD Entity, including but not limited to agents, suppliers and customers.

1. Introduction

Modern Slavery deprives a person from its human rights by exploiting that person for another's personal or commercial gain. The MMD Group is committed to the protection of human rights and the prevention of slavery and human trafficking in all its forms. MMD has a **zero-tolerance** approach to slavery and human trafficking which extends to all its operations and supply chains and we expect similar standards from all business partners.

Human trafficking can include, but does not necessarily require, the movement of persons. People may be considered trafficked victims regardless of whether they were born into a state of servitude, were exploited in their hometown, were transported to the exploitative situation, previously consented to work for a trafficker, or participated in a crime as a direct result of being trafficked. MMD will not tolerate, facilitate or condone any form of exploitation of persons across its business operations.

2. Purpose and Scope

The purpose of this Policy is to establish and communicate mechanisms to ensure compliance with anti-slavery and human trafficking regulations as well as ensuring the alignment of MMD Personnel to the ethical standards as set out in this Policy. The Policy applies to all MMD Personnel and Third Parties and is intended to ensure all are aware of the responsibilities they hold in safeguarding our supply chains and business operations from any form of human right violation.

3. Policy Statement

The protection against and prevention of Modern Slavery and human trafficking form part of MMD's human rights agenda. We recognize our responsibility to uphold human rights and ethical standards, and we are dedicated to taking proactive measures supported by our Policies with specific aim to prevent any form of Modern Slavery or human trafficking in our supply network.

4. Supply Chain Standards

Our responsibility in respect of Modern Slavery and the protection of human rights extends beyond the direct operations of MMD Group and its global entities. We seek to ensure that business dealings are subject to the principles of inclusivity, continuous improvement and supply chain accountability. MMD business partners are to maintain an active view on Modern Slavery and the protection of human rights and are subject to these standards as a condition of doing business with MMD. MMD Group expects that all goods and services provided to or sold by MMD, are manufactured or produced in accordance with our anti-slavery and human rights supply chain standards.

Our supply chain standards focus on preventing situations that can put workforces at risk of Modern Slavery. These standards require that all work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice in accordance with the relevant labour laws in each territory in which MMD operates.

All workers must be provided with documentation clearly stating the terms of employment in a language the worker can understand. The mining industry often reflects migrant workers that have unique vulnerability to situations of Modern Slavery. We expect our business partners and stakeholders to examine and monitor the practices of recruitment agencies and labour brokers and to employment agencies that act ethically and in the best interests of workers.

MMD will not engage with Third Parties that facilitate any form of slavery, including the use of Child Labour or forced labour, or which do not recognise freedom of association or collective bargaining. MMD requires that the Third Parties we work with should hold their own suppliers and partners to the same standards. MMD's ethical standards seek to continuously improve awareness of the practices necessary to combat Modern Slavery and human trafficking and to assess the risk profile of our business in these areas.

5. Inclusiveness and Diversity

The MMD Group endeavors to actively work toward recognising and addressing the inconsistencies in inclusiveness and diversity and the overall greater social equity by creating a more inclusive working environment within MMD. MMD expects that these standards of inclusion are followed by the Third Parties we work with.

6. Supplier & Customer Due Diligence

MMD undertakes to ensure that due diligence is done on all its suppliers and customers to ensure that the standards in this Policy are met. MMD recognises and understands that certain suppliers or customers have challenges when working to meet supply chain standards, however, this cannot deter our commitment to anti-slavery and human rights in the business place and therefore our business partners need to ensure best practices.

While Modern Slavery can be found in most countries, some countries are associated with a higher risk for Modern Slavery such as countries with a large population of migrant workers and weaker labour law regulation and enforcement, for example, where charging workers recruitment fees is common practice, or where Modern Slavery prevalence has been well documented. Suppliers in higher risk countries will be subject to stricter supply chain management and shall require an additional due diligence checks where warranted in order to secure a safe supplier relationship.

MMD strictly prohibits the use of all forms of forced and Child Labour in the operations or facilities of any MMD Entity or Third Party. MMD condemns the ill treatment of workers, including, without limitation, the exploitation of children, physical punishment or abuse and other modern forms of slavery.

7. Due Diligence of Agents

MMD recognises the inherent risks associated with the appointment of Agents, especially in countries exposed to high levels of corruption and unethical practices such as forced labour and human trafficking, emphasising the need for a stricter due diligence process to eliminate such risks and prevent illegal conduct on the part of Agents. When engaging Agents, MMD remains committed to ensuring that all products in the supply chain are produced in a safe, healthy, and inclusive environment.

8. Compliance with this Policy

MMD recognises that the prevention, detection, and reporting of Modern Slavery in any part of our business or supply chain is the responsibility of all those working within it. The MMD Group will request individual company assessments and declarations, where appropriate, and will endeavour to introduce standard wording into our supplier contracts that requires a supplier to represent, warrant and undertake that neither it nor any other person in its supply chain uses trafficked, bonded, child or forced labour or has attempted to use trafficked, bonded, child or forced labour within its supply chain.

MMD will retain the right to audit our supplier's and Agent's activities and where practical, relationships, both routinely and at times of any reasonable suspicion. If MMD finds that other individuals or organisations working on our behalf have breached this policy, we will ensure that we take appropriate action. Any MMD Personnel member who breaches this Policy may face disciplinary action as well as possible criminal charges, which could result in dismissal for misconduct or gross misconduct. If a Third Party is found to be in breach of this Policy, we may terminate our relationship and any contract or agreement in place. It is of significant importance that supplier and Agent due diligence is done in advance of any MMD Entity signing any contract or agreement with such a supplier or Agent.

9. Roles and Responsibilities

9.1 MMD Personnel

All MMD Personnel are required to read, understand, and act in compliance with this Policy. All MMD Personnel are further expected to:

- act with due regard to the health and safety of other MMD Personnel;
- respect the Human Rights and freedoms of other MMD Personnel;
- use good judgment and due diligence in all dealings with Third Parties.

9.2 The Human Resources Officer

The Human Resources Officer shall be responsible for:

- developing and promoting this Policy within the respective MMD Entities;
- ensuring compliance with this Policy and related policies of the MMD Group;

- dealing with queries relating to this Policy and related policies.

9.3 MMD Board of Directors

The MMD Board of Directors have an overall accountability to ensure that this policy complies with our legal and ethical obligations, and that all MMD Personnel and Third Parties comply with it.

10. Deviations from this Policy

The sophistication of this policy document and related documents is appropriate to the nature of the scale and complexity of MMD’s business operations. Should any deviation be considered or necessitated from this policy and its schedules, please contact Group Legal at mmdgrouplegalcounsel@mmdgphc.com.

Version information

Policy Name	Version	Policy Number	Language
MMD Modern Slavery Policy	1.0	3	English