GOVERNANCE / GROUP POLICIES

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Sets out the Group's commitment to preventing modern slavery, forced labour and human trafficking within its operations and supply chain. The Policy establishes expectations for employees, contractors and suppliers, including due diligence, reporting and compliance requirements.

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1. PURPOSE AND SCOPE

This policy sets Neo Energy Metals plc's minimum requirements to prevent, identify, mitigate and remediate modern slavery and human trafficking risks across the Group's mining projects, corporate activities and supply chains, including New Beisa and Henkries activities.

It applies to Neo and controlled subsidiaries, directors, officers, employees, agency workers, contractors, subcontractors, consultants, labour providers, suppliers, transporters, security providers and other business partners. For non-controlled joint ventures or associates, Neo will use its influence to promote equivalent standards.

The prohibition on modern slavery applies without exception at offices, exploration and project sites, mines, processing facilities, camps, accommodation, warehouses and any place where work is performed for Neo.

2. LEGAL FRAMEWORK

Neo will comply with applicable law in each jurisdiction. This policy is informed by the UK Modern Slavery Act 2015 (including section 54), South Africa's Prevention and Combating of Trafficking in Persons Act 7 of 2013 and applicable labour and child-protection laws, ILO fundamental principles, the UN Guiding Principles on Business and Human Rights and OECD responsible-business and mineral-supply-chain guidance.

Where this policy sets a higher standard than local practice, the higher standard applies unless prohibited by law. Questions or conflicts must be referred to Governance and Legal before work continues.

3. CORE POLICY REQUIREMENTS

3.1 Absolute Prohibitions

- Slavery, servitude, forced or compulsory labour, debt bondage, human trafficking, child labour and hazardous work by anyone under 18.
- Violence, threats, intimidation, harassment, coercion, restriction of movement, deportation threats or other conduct used to compel work.
- Withholding wages, benefits, deposits, identity documents or immigration documents to prevent a worker from leaving.
- Worker-paid recruitment or placement fees, deposits, or other employer-borne recruitment costs.
- Deceptive recruitment, contract substitution, compulsory overtime or work materially different from the terms offered at recruitment.
- Unlawful wage deductions, payment below legal minimums, payment to unauthorised third parties, or retaliation against a good-faith reporter or witness.

3.2 Fair Recruitment and Employment

- Recruitment agencies and labour brokers must be lawfully registered or licensed where required and subject to risk-based due diligence.
- Workers must receive accurate written terms before mobilisation, in a language and form they understand, with lawful age, identity and right-to-work checks.
- Wages must be accurate, timely and transparent; working hours, rest periods and overtime must comply with law, with overtime voluntary except for narrowly defined lawful emergencies.
- Workers must be free to terminate employment subject only to lawful notice and must be free to associate, join lawful trade unions and bargain collectively without intimidation or discrimination.

3.3 Young Workers, Accommodation, Transport and Security

No person below the lawful minimum age may be employed. No person under 18 may work underground, handle explosives, work with ionising radiation, operate hazardous plant or undertake other hazardous mining work.

Company-linked accommodation and transport must be safe and must not create debt, dependence or unreasonable restrictions on movement. Security and site access controls must protect people and assets without compelling labour or suppressing concerns.

4. GOVERNANCE AND ACCOUNTABILITY

Accountable Party	Core Responsibility
Board of Directors	Approves the policy, oversees material risks and incidents, reviews annual section 54 applicability and approves any required or voluntary modern-slavery statement.
Chief Executive Officer	Ensures leadership, resources and executive accountability for implementation.
Governance and Legal	Owns the policy; advises on legal obligations; coordinates material incident response, reporting, escalation and annual review.
Human Resources	Applies fair recruitment and employment controls, labour-provider checks, worker records, training, grievances and remediation support.
Procurement / Supply Chain	Risk-screens suppliers, embeds contract controls, retains due diligence evidence and monitors corrective actions.
Project / Site / HSSE / Security	Implements site and mobilisation controls, monitors working conditions and reporting access, and takes immediate protective action where required.

All workers must comply with this policy, complete required training and report concerns promptly. Business partners must comply with law and Neo contractual standards, cascade requirements to subcontractors, maintain records and cooperate in assurance and remediation.

5. SUPPLIER AND CONTRACTOR DUE DILIGENCE

Due diligence is ongoing and must be applied according to risk. The minimum process is:

1. Map the activity, workforce, labour providers, subcontractors, accommodation and mineral origin where relevant.
2. Screen the counterparty, licences, labour practices, allegations and enforcement history and assess modern-slavery risk before commitment.
3. Contract for compliance, record keeping, incident reporting, subcontractor flow-down, access to workers and records, corrective action and responsible termination.
4. Verify mobilisation controls before site access, including age, identity, right to work, written terms, recruitment-fee declarations, payroll and induction.
5. Monitor through worker interviews, payroll or timekeeping sampling, site inspections, grievance data, contractor meetings and risk-based audits.
6. Investigate concerns, protect affected people, require corrective action and provide or contribute to remedy where Neo caused or contributed to harm.
7. Track corrective action to closure and update risk ratings, procurement decisions and future controls.

Minimum contract requirements

Relevant contracts should, where lawful and proportionate, prohibit forced labour, worker-paid recruitment fees, document retention and child labour; require prior approval for material subcontracting or labour brokers; require accurate labour and payroll records and prompt incident notification; permit proportionate worker, site and record access; require time-bound corrective action; and allow suspension or termination for serious or unremedied breaches, subject to a responsible-exit assessment.

6. REPORTING CONCERNS AND NON-RETALIATION

Anyone may report a concern, suspicion or incident to a line manager, Site Manager, Human Resources, Governance and Legal, Neo's whistleblowing (Speak Up) channel, a worker representative or another site-approved channel. Contractors must provide equivalent accessible channels and escalate material allegations to Neo promptly.

Reporting channels should be confidential, permit anonymous reporting where practicable, be free to access and be communicated in languages and formats workers understand. Proof is not required before a genuine concern is raised.

Retaliation, dismissal, threats, adverse scheduling, loss of accommodation, deportation threats or other detriment against a good-faith reporter or participant in an investigation is prohibited.

7. INCIDENT RESPONSE, INVETIGATION AND REMEDIATION

Neo will protect people first, preserve confidentiality and avoid actions that could increase harm. The safety and informed wishes of affected persons will be central, subject to legal duties and immediate safety requirements.

Immediate response procedure

- Protect life and safety. If anyone is in immediate danger, contact the appropriate emergency services and take safe protective steps.
- Notify Governance and Legal and the relevant senior operational leader without delay. Do not confront suspected traffickers or conduct an informal investigation that could endanger workers.
- Where safe and lawful, separate the suspected victim from persons who may control or intimidate them and preserve relevant records.
- Engage suitably qualified legal, safeguarding, law-enforcement, labour, medical or civil-society specialists where appropriate.
- Governance and Legal will lead or oversee the investigation, with appropriate independence and confidentiality. Material matters are reported to the CEO and Board or delegated committee.

Remediation

Remedy may include safe accommodation, medical or psychosocial support, independent advice, repayment of recruitment fees or withheld wages, compensation, correction of employment status, safe return or transfer and support for access to justice. Neo will provide or contribute to remedy where it caused or contributed to harm and will use leverage where harm is directly linked through a business relationship.

Contract termination is not automatic. Neo will consider whether abrupt termination could increase harm and, where termination is necessary, plan a responsible exit to protect affected workers. Potential crimes and mandatory-reporting matters will be referred to competent authorities in accordance with law and victim-protection considerations.

8. TRAINING, RECORDS AND EFFECTIVENESS

Training will be proportionate to role and risk. Employees and regular site workers should receive awareness training at induction and periodic refreshers. Enhanced training will be provided to directors and executives, Human Resources, Procurement, Security, HSSE, Project and Site Management, contractor managers, grievance handlers and investigators.

Neo will retain appropriate due diligence, training, monitoring, incident and remediation records in accordance with applicable law and records-management requirements, with personal data limited and secured.

Effectiveness will be monitored through risk screening, mobilisation compliance, worker interviews and payroll evidence, training completion, reporting-channel awareness, audit and inspection findings, corrective-action closure and remediation outcomes.

9. ANNUAL REPORTING, BREACHES AND REVIEW

Annual Modern-Slavery Assessment

After each financial year, Governance and Legal will assess whether Neo or any Group entity is required to publish a statement under section 54 of the UK Modern Slavery Act 2015, including whether the relevant organisation carries on a business or part of a business in the United Kingdom, supplies goods or services and meets the applicable turnover threshold of GBP36 million. London Stock Exchange listing status alone does not determine whether the reporting duty applies.

Any required statement will be evidence-based, approved by the Board, signed by a director and published as required by law. The Board may also approve a voluntary statement.

Breaches and Review

Breaches may result in disciplinary action, removal from site, suspension of work, corrective action, withholding of mobilisation approval, contract suspension or termination, referral to authorities or other

lawful action. No manager may waive an absolute prohibition. Any exception to a procedural control must be lawful, risk-assessed, documented, time-limited and approved under Neo's delegation of authority.

This policy will be reviewed at least annually and earlier after a material incident, significant regulatory change, acquisition, entry into a new jurisdiction, major project-phase change or evidence that controls are ineffective.

10. RELATED GOVERNANCE DOCUMENTS

This policy should be read with the Code of Conduct and Ethics, Whistleblowing Policy, Supplier Code of Conduct and procurement procedures, recruitment and contractor-management procedures, HSSE and security procedures, grievance and investigation procedures, Delegation of Authority and records- management requirements. Where a related document is not yet in force, this policy remains applicable and proportionate interim controls must be implemented.