

CORNISH LITHIUM PLC ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1 INTRODUCTION

Cornish Lithium Plc (**CLP**) is an innovative critical minerals company focused on the environmentally responsible extract of lithium from Cornwall. CLP is committed to conducting business with honesty and integrity. CLP is a parent company and references to CLP in this policy extend to each subsidiary of and entity within the CLP group.

2 POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. CLP has a zero-tolerance approach to modern slavery and are committed to acting ethically 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.

CLP are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, agency workers, suppliers, consultants and other business partners and, as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

3 ABOUT THIS POLICY

The purpose of this Policy is to:

- a. set out our responsibilities, and of those working for and on our behalf, in observing and upholding our position on modern slavery and human trafficking; and
- b. provide information to those working for and on our behalf on how to identify and report concerns regarding modern slavery and human trafficking.

This Policy applies to all persons working for CLP 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, sponsors, or any other person associated with us, wherever located. This Policy does not form part of any employee's contract of employment.

4 RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this Policy complies with CLP's legal and ethical obligations, and that all those under our control comply with it.

CLP's Chief Operations Officer (**COO**) has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about

it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to CLP's General Counsel.

5 YOUR RESPONSIBILITIES AND HOW TO RAISE A CONCERN

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of modern slavery in any part of CLP's business or supply chains is the responsibility of all those working for or under CLP's control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

You must notify your manager, CLP lead or COO as soon as possible if you believe or suspect that a breach of this Policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of CLP's business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect that a breach of this Policy has occurred or that it may occur you must notify your manager, CLP Lead, COO or report it in accordance with CLP's Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or COO.

CLP 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. CLP are committed to ensuring no one suffers any detrimental treatment because 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. If you believe that you have suffered any such treatment, you should inform COO immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the procedure set out in our Grievance Policy and Procedure as set out in the Employee Handbook.

6 TRAINING AND COMMUNICATION

Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery in our business and supply chains must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate on an ongoing basis.

7 BREACHES OF THIS POLICY

Any CLP employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

CLP may terminate relationships with other individuals and organisations working on CLP's behalf if they breach this Policy.