



Anti-modern slavery and human trafficking policy and procedures

ANTI- MODERN SLAVERY AND HUMAN TRAFFICKING POLICY AND PROCEDURES

I. SCOPE AND INTRODUCTION

Slavery and human trafficking are crimes and a violation of human rights. We have a zero-tolerance approach to slavery and human trafficking anywhere in our business including with those we work with in our supply chain.

Modern Slavery is a term used to encapsulate offences in the UK Modern Slavery Act 2015: slavery, servitude and forced or compulsory labour; and human trafficking.

Modern Slavery involves the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and encompasses practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable groups; and arranging or enabling the trafficking of persons.

II. PURPOSE

The purpose of the Policy is to help prevent modern slavery from occurring and to protect the Company and its personnel from breaching the Modern Slavery Act 2015 and other anti-slavery laws which apply overseas.

III. WHAT IS COVERED IN THIS POLICY AND PROCEDURES

This Policy:

- sets out the principles that all personnel, business partners and contractors must follow and
- provides further guidance on the Modern Slavery Act 2015 including details in the procedures of how to spot red flag issues and practical steps to take with our business partners, supply chain and other third parties we work with;

IV. WHO IS COVERED BY THE POLICY

All personnel, including any director, officer, or employee of the Company, as well as joint venture and business partners, contractors, and suppliers and service providers to the Company must comply with the Policy.

The Policy does not form part of any employee's contract of employment and may be amended at any time.

V. ROLES AND RESPONSIBILITIES

The Board of Directors of Wentworth is ultimately responsible for overseeing and implementing this policy and procedures and has approved them. The Chief Executive Officer is the Executive sponsor and the officer responsible for the Policy.

Directors, officers and employees who know of or suspect any violation of this policy have an obligation to immediately follow the reporting procedures set out in the Company's Speak Up/Reporting of Violations Policy.

VI. CONSEQUENCES OF NON-COMPLIANCE

Any breach of this Policy and procedures by any Company personnel will be investigated by the Company and may involve disciplinary procedures also being initiated. A serious breach may amount to gross misconduct, and could therefore result in summary dismissal.

Any breach of this Policy and its associated procedures by business partners, contractors and other third parties will be investigated and any breach may result in relevant contracts being terminated.

As criminal offences can also arise for breaches of the UK's modern slavery legislation, a breach of this policy may also be a criminal offence where Company personnel, business partners, contractors and other third parties could face separate law enforcement investigations and prosecutions.

VII. **POLICY STATEMENT**

Slavery and human trafficking are crimes and a violation of human rights. We have a zero-tolerance approach to slavery and human trafficking.

The following key principles apply to all Company activities including in our work with joint venture and business partners, contractors, and suppliers and service providers:

- Child (under 18 years of age) labour must not be used and we and our suppliers must not benefit from child labour.
- Any form of forced or compulsory labour must not be used and we and our suppliers must not benefit from forced or compulsory labour.
- Workers must be free to leave employment or work after reasonable notice.
- Passports must not be taken from workers without proper legal justification.
- All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation or some other costs that they have little opportunity to repay.
- Compensation and benefits must comply with fundamental principles relating to minimum wages, overtime hours and legally mandated benefits.
- The formation of trade unions and powers of collective bargaining should be respected.
- We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own activities or in any of our supply chains.
- We will not do business with suppliers who do not follow our anti-modern slavery principles or who do not have in place equivalent principles and standards to those set out in this Policy and Procedures.

VIII. **FURTHER GUIDANCE ON MODERN SLAVERY**

The UK Modern Slavery Act 2015 makes it a criminal offence for a person to:

- hold another person in slavery or servitude;
- force another person to work in circumstances where the person knew or ought to know that the other person is being required to perform forced or compulsory labour;
- arrange or facilitate the travel of another person with a view to that person being exploited;
or
- procure or facilitate any of the above offences.

Larger commercial organisations are required to prepare and publish an annual statement of the steps they have taken to prevent modern slavery. Whereas this does not apply to Wentworth, this policy and procedures sets out the steps the Company is adopting to prevent modern slavery in all its forms.

Please refer to the procedures appended to this Policy for further information of the categories of modern slavery and human trafficking and practical measures all personnel must take to ensure compliance with the Company's standards and this Policy.

IX. **DOCUMENT HISTORY**

18 February 2021	Approved and adopted by the Board of Directors of Wentworth Resources Plc
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APPENDIX:

ANTI- MODERN SLAVERY AND HUMAN TRAFFICKING PROCEDURES

1. CATEGORIES OF SLAVERY OR HUMAN TRAFFICKING

Slavery or human trafficking can take many forms and might include practices such as: forced labour (i.e. involuntary work coerced by threatening behaviour); the sale and exploitation of children and other vulnerable people; arranging or enabling the trafficking of persons; or any other practice that may deprive one person of their liberty or freedom in order to exploit them for personal or commercial gain.

Slavery or human trafficking can be hard to spot but it can be thought of in three categories:

Human trafficking	Labour exploitation	Other slavery like practices
<p>1. Recruitment, transportation, transfer, harbouring or receipt of persons;</p> <p>2. By means of threat, force, coercion, abduction, fraud, deception, or the abuse of power or vulnerability;</p> <p>3. With the intent of exploiting that person through: prostitution; sexual exploitation; forced labour; slavery; servitude; or removal of organs.</p> <p><i>(Exerts from the UN Trafficking Protocol, 2000)</i></p>	<p>All work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself voluntarily.</p> <p><i>(ILO Forced Labour Convention, 1930 (No. 29))</i></p>	<p>Attaching and exercising some form of ownership of a person which deprives them of their freedom. It includes slavery-like practices: debt bondage, forced marriage, sale or exploitation of children.</p> <p><i>(Summary of the Slavery Convention (1926) and Supplementary Slavery Convention (1956))</i></p>

2. THESE PROCEDURES

These procedures set out:

- (a) recognised red flags which all personnel of the Company should be alert to, and report as required under the Policy;
- (b) due diligence requirements to conduct on the engagement of a new supplier;
- (c) guidance on how to assess risk, on the basis of due diligence; and,
- (d) mitigation steps.

3. **RED FLAGS**

There are slavery and human trafficking warning signs (or "red flags") that should be considered by those dealing with suppliers during contractual negotiations, site visits, audits or any interaction with a supplier and its workers.

The Company's policy is to encourage our employees and staff to be alert for red flags. Examples are set out below. Taken individually not all of these mean that that slavery or trafficking is actually taking place. A single red flag may be sufficient to raise concerns requiring further assessment and escalation or it may be a combination of these factors. This is a complex area so if something does not "feel right" and/or red flags are identified, such as those set out below, these should be reported immediately under the Company's Speak Up/Reporting of Violations Policy.

SIGNS FROM THE SUPPLIER OR SERVICE PROVIDER

The following signs may give rise to suspicions that slavery or human trafficking could exist in the business of a supplier:

- The operations (e.g. manufacturing) of a supplier being based in countries where slavery and/or human trafficking has been identified as more prevalent.
- Immigrant workers employed by the supplier being from a country where slavery and human trafficking has been identified as being more prevalent.
- Unsatisfactory or inadequate records held by the supplier of an individual's immigration/right to work status for the country in question.
- Workers being persistently subjected to excessive overtime or other overly demanding conditions (for example where health, safety and welfare conditions are poor or non-existent).
- The supplier provides accommodation for their workers, which may be substandard – for example, where workers are living in severely overcrowded conditions.
- A lack of grievance mechanisms for employees to raise employment related complaints or concerns.
- Evidence that indicates groups of workers have to work to the direct orders of an overbearing gang master.
- Reluctance to allow third party site, factory or other inspections or audits.
- The business having no policy or programme in relation to slavery or human trafficking, or no similar employee policies.
- Interviews or conversations with workers giving rise to concerns.
- Instances of slavery or human trafficking identified in the supplier's business, or a linked company.

SIGNS FROM THE WORKER

The victim's behaviour, working conditions, or finances may give an indication that they are subjected to slavery like practices or have been trafficked unlawfully.

Behaviour

Workers may:

- Shows signs that their movements are being controlled or intrusively monitored.
- Be threatened with being handed over to authorities if they fail to work or behave as instructed.
- Depend on their employer for work, transport and accommodation without any choice.
- Only travel with other people who work for the employer or the gang master or labour agency supplying workers to an employer.

- Have limited contact with their families or people outside their immediate work environment.
- Have their passports removed.
- Be required to pay recruitment fees, travel or accommodation costs directly out of their wages.
- Be in a situation of dependence.
- Come from a place that has been identified as a location where slavery or human trafficking is prevalent.
- Be afraid of revealing their immigration status.
- Show fear or anxiety.

Working / living conditions

Workers may:

- Have no contract, or be unable to negotiate working conditions.
- Be forced to work under certain conditions.
- Work excessively long hours over long periods.
- Not be dressed adequately for the work that they do: for example, they may lack protective equipment or warm clothing.
- Not interact with work colleagues.
- Lack basic training or professional licences.
- Believe they are obliged to work without pay in return for provision of accommodation.
- Live in poor or substandard accommodation (e.g. they are overcrowded, dangerous or unsanitary), or have no choice where they live or who they live with, or live in groups in the same place.

Finances

Workers may:

- Receive little or no payment.
- Have no access to their earnings.
- Be disciplined through punishment or fines.
- Be under the perception that they are bonded by debt.
- Have the fees for their transport to a destination country paid for by their employer or facilitator, which they must pay back through work.
- Be charged for services they do not want or need.
- Be forced to open bank accounts.
- Have wages paid into an account used by other people.
- Have bank cards / documents held by someone else.

4. DUE DILIGENCE

If you are considering taking on a new supplier or extending a contract with an existing supplier, then in addition to other due diligence required by other Company policies and procedures (such as for anti-corruption compliance purposes) consideration should also be given to the risk that supplier poses from a slavery and human trafficking perspective.

Please conduct the following initial due diligence questionnaire ahead of engaging suppliers.

Questions

1. Does the supplier operate facilities or sites which require a high number of unskilled workers or labourers?
2. Are you aware that the supplier provides accommodation to his workers on site or near to a facility?
3. Does the supplier use a high level of migrant workers from poorer countries?
4. Does the supplier utilise workers provided by a third party such as a labour agency or gang master?
5. Is the supplier operating in any country where 0.2% or more of the population are in slavery according to the "Walk Free Foundations Global Slavery Index" (www.globalslaveryindex.org/findings)?
6. Are the supplier's charges significantly lower than other suppliers in the market?
7. Has the supplier previously been reluctant for you, a colleague or a third party to visit their sites/premises?

If the answer is "yes" or "don't know" to any of the above questions, a self-assessment questionnaire should be issued to the supplier. The self-assessment questionnaire should then be reviewed and consideration given to further measures such as conducting a site visit or engaging an independent auditor. Please see Annex A for the self-assessment questionnaire.

NEXT STEPS ON RECEIVING THE DUE DILIGENCE: RISK ASSESSMENT

The red flags or key risk indicators which might be identified through the responses to the questionnaire are similar to the red flags in Section 3 of these procedures above.

Where the due diligence process has triggered the issuing of a self-assessment questionnaire then a supplier specific risk assessment may need to be undertaken in relation to that supplier, taking account of the outcome of any additional audit and/or inspection.

In the event that a supplier has been identified as high risk and control measures cannot be implemented to adequately reduce or control that risk then either:

- We should decline to contract with the relevant supplier, or
- The assessment should be escalated to the CEO as the officer responsible for the Company's Anti-Modern Slavery and Human Trafficking Policy and Procedures to consider whether we can continue to engage with the supplier and if so, on what basis.

WHAT WE SHOULD NOT DO

Although it is necessary to undertake due diligence and ask the right questions it is not our role to undertake detailed investigations of any complaints/suspicions from a whistle blower or other reports (including issues identified through the due diligence process) that acts of slavery or human trafficking are **actually** taking place within a supplier. If we do it may:

- Place you or someone else within the business at risk;
- Could place a vulnerable at-risk person in danger; and
- May prejudice an investigation by a responsible legal authority that, without our knowledge, may have already started in relation to the relevant supplier.

This does not mean that any allegations we receive will not be taken seriously. If a complaint is received this must be escalated to the CEO as the officer responsible for the Company's Anti-Modern Slavery and Human Trafficking Policy and Procedures to consider what action is required, including the potential notification of the issue to a responsible legal authority.

POSSIBLE MITIGATION STEPS

There are a variety of steps you can take, to the extent that the questionnaire results in the identification of risk.

- Conducting a site visit to the supplier.
- Requiring the supplier to sign up to, or agree, a protection in its contract. Sample drafting is provided below.
- Agreeing an action plan with the supplier to put in place or rectify issues that have been identified during the due diligence process.

An action plan should contain specific actions and an appropriate timetable with a form of declaration by the supplier on completion. An action plan may include process issues such as record keeping or the establishing of a policy or code of conduct; in addition, the plan may also address operational issues such as living conditions.

To the extent that it is considered that a contractual protection should be required from the supplier, please see Annex B below for the proposed contractual provision.

Although mitigation steps may be appropriate to address areas of putting measures in place does not mean that we will continue to work with suppliers where we have reason to suspect that modern slavery or human trafficking is taking place within the supplier's business. In those circumstances the matter must be escalated to the CEO as the officer responsible for the Company's Anti-Modern Slavery and Human Trafficking Policy and Procedures for further investigation. We will then consider what further action, if any, is necessary.

Annex A

Self-assessment questionnaire to be issued to suppliers

ANTI-SLAVERY SELF-ASSESSMENT QUESTIONNAIRE

Please complete this questionnaire and return it to your contact at Wentworth Resources Plc.

This survey focuses on exposure to risk under anti-modern slavery legislation. Slavery or human trafficking means the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain and encompasses practices such as: child labour; forced or compulsory labour; removal of a worker's passport; any form of debt bondage; pay that does not accord with minimum wage requirements; the illegal transportation or trafficking of people. Wentworth Resources has a zero tolerance approach.

I. SUPPLIER DETAILS:

I.1 Name and address

Name:

Company number:

Address:

City: County/State:

Country: Postal Code:

Telephone: Facsimile:

Website Address:

Type Of Business:

Contact Person:

Email Address:

I.2 Which of the following best describes your/the business?

Individual / Sole Proprietor Partnership Publicly Traded Corporation

Private Corporation Limited Liability Partnership Public Official/State Company

Other (please specify):

I.3 In which countries are the operations of your business?

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.....
.....

I.4 Date your business was established (mm/dd/yyyy):

II. WORKFORCE AND WORKING PRACTICES

II.1 How many people do you employ?

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II.2 Are employees all on a written contract of employment? If they are, please provide a template contract?

NO YES

.....

II.3 Do you engage contractors or agency workers? If you do, please detail the type of contractors and agency workers engaged.

NO YES

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.....

II.4 Are any contractors or agency workers from overseas? If they are, please detail the countries and describe the situations where people from overseas work for you.

NO YES

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.....

II.5 Do you provide any employees, workers or contractors with accommodation? If you provide accommodation, please explain what is provided, to whom and where.

NO YES

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II.6 Are your employees able to join a trade union? If yes, please provide the name of any trade union bodies? If no, please explain why not?

NO YES

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II.7 What are your employees' standard hours of work?

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II.8 Are your employees paid overtime? If yes, please explain when overtime is paid. If no, please explain why not.

NO YES

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II.9 Do you have anyone under the age of 16 years old working for you as an employee, agency worker or contractor? If the answer is "yes" please provide details of the age range, the number of personnel under 16 years of age, what work they undertake and their hours of work.

NO YES

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III. POLICIES AND PROCEDURES – ANTI-SLAVERY AND HUMAN TRAFFICKING

III.1 Please indicate whether your business has a code of conduct or any other policy to address the following? If so, please provide copies.

- Overall code of conduct / ethics
- Slavery or human trafficking
- Human rights:
- Non-discrimination:
- Forced labour:
- Child labour:
- Employee health & safety:
- Freedom of association / collective bargaining:

III.2 Have any instances of slavery or human trafficking been identified in your business or the businesses of your suppliers or third parties that you work with? If so, please describe what has occurred and any steps taken to remedy the issue.

NO YES

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.....

III.3 Is there perceived to be a risk of slavery or human-trafficking taking place in your business or supply chain? Please explain your answer.

NO YES

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.....

III.4 What steps have you taken to identify and manage any risks of slavery or human trafficking taking place in your business? Please select from the following options and explain.

- Risk assessment
- Internal training
- Other

.....
.....

III.5 If you have selected training, please detail how it is provided?

Face-to-face Online Other

When was the training last
provided?

How regularly is the training
provided?

What did the training cover?

III.6 Is the training part of the induction process for new employees?

NO YES

III.7 Do you conduct i) independent and/or ii) unannounced audits of your sites? If so, please explain if these processes are random or risk based?

NO YES

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.....

III.8 What steps have you taken to assess and manage any risk of slavery or human trafficking taking place in your supply chain? Please also describe the process

Risk assessment

Due diligence

Audit

Training

Other

.....
.....

III.9 If you have selected "audits", please explain if these processes are random or risk based. Please also explain if the audits are i) unannounced and/or ii) independent.

.....
.....

III.10 Do these audits involve any of the following:

on and off-site interviews with workers? NO YES

a review of company documentation? NO YES

interviews with management personnel? NO YES

inspection of the workplace? NO YES

personnel recruitment sources, including overseas employment agencies promoting imported labour? NO YES

III.11 Have you informed suppliers of the consequences of negative audits in respect of slavery or human trafficking?

NO YES

III.12 Do you require your direct suppliers to certify that the product or service was sourced, processed, manufactured, and provided in compliance with the slavery or human trafficking laws of the country or countries in which they operate?

NO YES

Annex B

Sample contractual protection

Note: The following is a generic clause and may need to be tailored so that it is consistent with the specific agreement in which it is being inserted. The circumstances of the particular arrangement may warrant stricter contractual controls (for example, indemnities, enhanced audit rights and country specific clauses) . Legal advice should be taken before entering into any contract.

Sample contractual language:

1. The Supplier represents and warrants that it:
 - (1) has not been and is not engaged in any practices involving the use of child labour, forced labour, the exploitation of vulnerable people, or human trafficking ("**slavery and human trafficking**");
 - (2) its employees and agency workers are paid in compliance with all applicable employment laws and minimum wage requirements; and
 - (3) will take reasonable steps to prevent slavery and human trafficking in connection with the Supplier's business.
2. The Supplier agrees to respond to all reasonable requests for information required by the Company for the purposes of compliance with the Company's anti-slavery and human trafficking policy and procedures.
3. The Supplier will permit the Company and its third party representatives, on reasonable notice during normal business hours, but without notice if there are reasonable grounds to suspect an instance of slavery and human trafficking to access and take copies of the Supplier's records and any other information held at the Supplier's premises and to meet with the Supplier's personnel and more generally to audit the Supplier's compliance with its obligations under this Clause [x]. The Supplier shall give all necessary assistance to the conduct of such audits during the term of this Agreement.
4. Any instances of slavery and human trafficking connected to the Supplier will entitle the Company to immediately terminate the Contract.