

ECORA RESOURCES PLC

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. INTRODUCTION

- 1.1. This voluntary statement is made on behalf of Ecora Resources PLC (“**Ecora**” or the “**Company**”) pursuant to section 54 of the Modern Slavery Act 2015 (the “**Act**”) and constitutes Ecora’s modern slavery and human trafficking statement for the year ending 31 December 2023.
- 1.2. This statement details Ecora’s approach to identifying and mitigating modern slavery and human trafficking risks in its business, investments and supply chains, as part of our broader environmental, social and governance (“**ESG**”) agenda.
- 1.3. This statement is supported by our ESG Policy and underpinned by our Code of Conduct

2. OUR STRUCTURE, STRATEGY, SUPPLY CHAINS AND GOVERNANCE

STRUCTURE

- 2.1. Ecora is a leading royalty company, listed on the London Stock Exchange and the Toronto Stock Exchange, focused on supporting the supply of commodities essential to creating a sustainable future, such as cobalt, nickel, copper and vanadium.

STRATEGY

- 2.2. Our strategy is to acquire royalties and streams over low-cost operations and projects with strong management teams, in well-established mining jurisdictions in the commodities that enable the energy transition or that are high quality products procured in a more sustainable way. Ecora believes that investment success and long-term value can only be achieved through sustainable and responsible investment with a strong focus on sustainability factors. As a result, we are committed to integrating ESG considerations into our strategic decision-making and capital allocation.
- 2.3. While we do not operate any of the assets underlying our royalty portfolio and hence do not control the manner in which operations are carried out, we recognise that we face ESG risks through the investments we make. Therefore, Ecora seeks to promote responsible mining extraction and strong management of ESG issues through a range of mechanisms at our disposal, including our policies, our due diligence on new investments and our ongoing engagement with operator partners.

EMPLOYEES AND SUPPLY CHAIN

- 2.4. We have a total of twelve full-time and one part-time employee. Through our policies described below in Section 3, we strive to provide a safe, open and welcoming environment to all our employees, including temporary workers whom we engage from time to time. As described below, Ecora has implemented a Grievance Procedure and Whistleblowing Policy for our employees and temporary workers, which enables them to voice complaints on an anonymous basis and seek help should they ever encounter any wrongdoing or concerns on a range of matters, which also include a suspected or actual violation of human rights, including but not limited to modern slavery or human trafficking.

- 2.5. We do not engage a large number of direct suppliers. Our hybrid working policy allows our thirteen employees to work remotely from their homes and to continue to work in a safe environment in the London office, which does not require a significant number of staff, permanent or temporal, to service it. We procure office cleaning services through a leading independent commercial premise and office cleaning company (City & Essex), which is affiliated with The Living Wage Foundation and is an accredited member of The British Institute of Cleaning Science. Most of our suppliers are professional service providers in the areas of finance, legal services or consultancy, whom we consider to be low-risk from a modern slavery or human trafficking perspective. Beyond that, we procure IT and office equipment for the running of our day-to-day business. We recognise there may be some risk of modern slavery further down the supply chain of these suppliers, for example in IT hardware raw materials.

GOVERNANCE

- 2.6. Ecora is committed to upholding high corporate governance standards as a standard listed company on the London Stock Exchange. In addition to complying with rules and regulations relevant to our listing status, we also voluntarily observe additional governance standards to maximise shareholder value. Our Board supports the principles and provisions of the UK Corporate Governance Code ("**Code**") issued by the Financial Reporting Council and we adhere to the requirements of the Code on a voluntary basis.
- 2.7. The key elements of our governance framework are: (i) regular Board meetings with a formal schedule, (ii) established procedures for planning and approving investments; (iii) our policies drafted and implemented to reflect our business model and office environment; and (iv) annual risk assessment process of key risks and uncertainties, which Ecora faces. The Board is responsible for reviewing the annual risk assessment process for completeness and accuracy, and the Audit Committee receives reports about significant risks.
- 2.8. In 2022, we were very pleased to join the United Nations Global Compact. As a Participant, we have committed to voluntarily aligning our operations and strategy with the ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. Going forward, we will report on our progress annually as part of this commitment and submit an annual Communication on Progress.
- 2.9. Ecora's governance is structured to deliver an entrepreneurial Board, which successfully establishes and maintains Ecora's performance and internal control environment. We ensure that our internal controls are robust by regularly assessing the effectiveness of our policies and procedures, including those relating to environmental, social and governance issues, both internally and with respect to our mining partners. Our Sustainability Committee is responsible for overseeing compliance with the ESG Policy and the development, implementation and on-going monitoring of Ecora's processes supporting sustainable investment. Our Board and employees are committed to championing and embedding the Ecora's purpose, values and standards, which are set out in our Code of Conduct.

3. POLICIES

- 3.1. Given Ecora is not an operator of the operations underlying our portfolio of royalties and streams and we operate solely within office environments, our policies and governance framework are drafted to reflect our business model and office environment.
- 3.2. Ecora approaches the risk of modern slavery in its business, investments and supply chains seriously.
- 3.3. We implement policies to identify areas of potential concern at a group level.
- 3.4. **Employee Grievance Procedure** provides a formal process for handling complaints, which cannot be resolved quickly or informally through a discussion with the line manager or the

CEO. The Grievance Procedure aims to respond to any lodged grievances within a week and allows for employee appeals where needed.

- 3.5. **Whistleblowing Policy** enables Ecora's employees to anonymously report any wrongdoing or concerns on a range of matters. Every incident of whistleblowing reported is investigated fully with appropriate remedial action taken. We operate our Whistleblowing Policy on a fully non-retaliation and confidential basis.
- 3.6. **Health & Safety Policy** is issued in compliance with section 2(3) of the Health and Safety at Work etc. Act 1974 and sets out Ecora's commitment to providing a safe working environment. It applies to all directors, employees, as well as all contractors and consultants to Ecora. It is easily accessible to all employees. We review this policy and undertake office risk assessments on an annual basis.
- 3.7. **Anti-Bribery and Corruption Policy** shows that Ecora has a "zero-tolerance approach" to bribery and corruption. The policy provides examples of "red flag" events, thus simplifying identification process for the employees. It also clearly sets out consequences of non-compliance with the policy, both on the external (regulatory) and internal level. The policy extends to all subsidiaries and all persons employed or working for or with Ecora. The ultimate responsibility for the policy lies with the Board of Directors.
- 3.8. **Diversity, Inclusion and Equal Opportunities Policy** demonstrates Ecora's commitment to equality of opportunity and diversity in the workplace to create and maintain a positive working environment that reflects our values - Sustainability, Integrity and Respect, Diversity and Collaboration. The Board recognises the importance of diversity and inclusion to the long-term success of the Company. Ecora considers true diversity to encompass and make good use of differences in the skills, regional and industry experience, background, race, gender and other attributes of all its personnel.
- 3.9. The Diversity, Inclusion and Equal Opportunities Policy is complemented by the **Anti-Harassment Policy**, which demonstrates Ecora's commitment to provide a working environment, free of harassment and bullying and ensuring all staff are treated, and treat others, with dignity and respect. The principles of non-discrimination set out in the Anti-Harassment Policy apply to dealings with people outside the workforce such as suppliers, clients and visitors to Company premises.

4. DUE DILIGENCE ON OUR INVESTMENTS AND ONGOING ENGAGEMENT

COMMITMENT TO RESPONSIBLE INVESTMENT

- 4.1. Ecora is committed to upholding high standards of responsible investment and business conduct. As a royalties investing business focused on the mining industry, issues related to safety and the use of best practice techniques, particularly when operating in close proximity to communities, are top priority for Ecora when undertaking due diligence in relation to our existing and potential assets.
- 4.2. Ecora recognises that our major sustainability impacts arise through the investments that we decide to make as a business. Our investment decision making is guided by our ESG Policy, which outlines how we mitigate risk through our investment decisions, due diligence, contractual agreements and ongoing engagement with our operating partners.
- 4.3. We use our understanding of modern slavery risks, due diligence process and our ESG risk due diligence framework and monitoring tools ("**ESG Risk Assessment and Monitoring Framework**") to make an informed decision about new investments. Our ESG Risk Assessment and Monitoring Framework ensures that counterparties maintain appropriate processes to mitigate modern slavery risks and we ongoingly engage with counterparties to understand how any issues are resolved. We are committed to doing business with integrity and aim to ensure that all of our counterparties have strong ethics and compliance

programmes in place. We include relevant ethics and ESG provisions in our contracts and encourage counterparties to align with ESG best practice and frameworks.

- 4.4. In 2021, the Sustainability Committee approved an updated ESG Risk Assessment and Monitoring Framework that ensures that our approach and assessment tools match rapidly evolving best practices. We engaged a leading provider of ESG risk frameworks to assist in the process. Our ESG Risk Assessment and Monitoring Framework includes dedicated sections for human rights, labour and supply chains.
- 4.5. We are committed to conducting a thorough due diligence process which enables us to benchmark each potential investment against a stringent list of internal, as well as international best practice criteria, including in relation human rights, labour and supply chains and modern slavery risks. Our robust due diligence process enables us to select projects and operators with lower levels of ESG risk and which have strong ESG management processes in place. In particular, we assess all new investments on the following criteria to ensure that we manage human rights, labour and supply chain risks:

Human Rights and Labour Assessment Criteria	
• Host country labour practices	• Rights of indigenous peoples
• Health & safety (occupational and workforce)	• Labour rights
• Child labour and forced labour risks	• Community relations & stakeholder support
• Local procurement programmes	• Direct host community employment

COMMITMENT TO RESPONSIBLE OPERATIONS

- 4.6. We also believe that to be a responsible investor, it is important that we understand our partners’ approach to human rights, modern slavery risks and compliance processes. To achieve that, we engage with our operator partners to understand and monitor their processes to ensure they are aligned with best industry practices. We are also monitoring and auditing our current portfolio on an ongoing basis.
- 4.7. To the extent possible we aim to:
- 4.7.1. conduct a thorough annual assessment of our operators’ disclosures regarding sustainability and engage with our operators on relevant risks and opportunities that require further detail or investigation which arise from such assessment;
 - 4.7.2. incorporate ESG-related audit and inspection rights into our agreements;
 - 4.7.3. conduct regular site visits and gather periodic reports from our operating partners on their ESG activities;
 - 4.7.4. insert change of control clauses which help us ensure that the assets will continue to be operated by responsible companies in cases of ownership change;
 - 4.7.5. encourage our counterparties to align with leading ESG initiatives, including among others:
 - 4.7.5.1. ICMC Sustainable Development Framework
 - 4.7.5.2. IFC Performance Standards

4.7.5.3. Voluntary Principles on Security and Human Rights

- 4.8. Finally, where we consider necessary in light of potential risks, Ecora engages consultants with relevant expertise to assist with identifying and mitigating any ESG risks.
- 4.9. Before we engage suppliers and advisors, we conduct standard due diligence (and, if necessary, enhanced due diligence) on all our suppliers and advisors. Our due diligence questionnaires include questions relating to human rights and modern slavery risks, where relevant. Our supplier and advisor contracts include ethics, compliance and ESG clauses.

5. EFFECTIVENESS TRACKING

- 5.1. In order to progress our journey of identifying and mitigating the risks of modern slavery and human trafficking occurring anywhere in our business, our supply chains and investments, we have agreed the following Key Performance Indicators (KPIs) for the financial year ending 31 December 2023:
 - 5.1.1. Review and update our ESG Policy and Code of Conduct
 - 5.1.2. Provide metrics arising from our operator partner assessments
 - 5.1.3. Provide and roll-out tailored ESG training during 2023

This Statement was approved by the Board of Directors of Ecora Resources PLC on 10 November 2022, and was signed by Marc Bishop Lafleche, CEO, on 3 January 2023.



Marc Bishop Lafleche, CEO