

ACG Metals Limited

Modern Slavery Statement

7 April 2026

Introduction

ACG Metals Limited ("ACG Metals" or "the Company") is committed to conducting its business with integrity and upholding the highest ethical standards. This statement outlines the steps we have taken to ensure that modern slavery and human trafficking are not present in our operations or supply chains, in compliance with the UK Modern Slavery Act 2015.

Our Business and Structure

ACG Metals is a London-listed mining company focused on consolidating the critical metals industry, starting with the copper sector. In September 2024, we acquired the Gediktepe Mine in Türkiye from Lidya Madencilik Sanayi ve Ticaret Anonim Şirketi, a subsidiary of Istanbul-based conglomerate Çalık Holding. This acquisition positions ACG Metals as a premier copper producer on the London Stock Exchange and provides an excellent platform for further consolidation of copper assets globally.

The Gediktepe Mine is operated by our subsidiary, Polimetal Madencilik Sanayi ve Ticaret A.Ş. ("Polimetal Madencilik"), located in Balıkesir Province, western Türkiye. Currently producing gold and silver from oxide ore, the mine is expected to transition to primary copper and zinc production from 2026, targeting an annual steady-state copper equivalent production of 20-25 kt.

Our Policies on Modern Slavery and Human Trafficking

ACG Metals has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships. Our policies reflect our commitment 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. We have the following policies in place relevant to modern slavery, which we continuously review and update:

- Whistleblowing Policy;
- Disciplinary Procedure and policy; and
- Grievance Procedure and Policy

Due Diligence Processes

As part of our initiative to identify and mitigate risk, we have implemented due diligence procedures, including:

- **Risk Assessment:** Evaluating potential risk areas in our supply chains, particularly focusing on regions and sectors that may pose higher risks of modern slavery.
- **Supplier Vetting:** Conducting thorough background checks on potential suppliers and partners to ensure they share our commitment to combating modern slavery.

- **Contractual Obligations:** Incorporating specific prohibitions against the use of forced, compulsory, or trafficked labor, or anyone held in slavery or servitude, into our contracts with suppliers.

Supply Chain Management

Our supply chains include the sourcing of raw materials, equipment, and services necessary for mining operations. We recognize that certain supply chains may pose a higher risk of modern slavery, particularly those involving raw material extraction and processing. To mitigate these risks, we:

- **Engage with Suppliers:** Work closely with our suppliers to ensure they understand and comply with our standards.
- **Audits and Inspections:** Conduct regular audits and inspections of our supply chain to monitor compliance with our policies on modern slavery.

Training and Awareness

We provide training to our employees and management to ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and supply chains. This training is designed to help staff identify and report potential issues related to modern slavery.

Monitoring and Reporting

ACG Metals is committed to continuous improvement in our approach to tackling modern slavery. We regularly review our policies and procedures to ensure their effectiveness. Employees and stakeholders are encouraged to report any concerns related to modern slavery through our confidential reporting mechanisms.

Approval

This statement has been approved by the Board of Directors of ACG Metals Limited and will be reviewed annually.

Artem Volynets

Chairman and CEO

ACG Metals Limited

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