



As required under section 54 (Transparency in Supply Chains) of the Modern

Slavery Act 2015

For the year ending 31st December 2024

Statement

Shuka Minerals PLC takes its responsibilities to uphold and maintain the highest standards of human rights very seriously.

The Company commits to supporting the elimination of all forms of modern slavery including forced or compulsory labour, child labour, and human trafficking across our operations or supply chains.

The Company is committed to upholding the highest of ethical standards throughout all aspects of its business, which include respecting and safeguarding the human rights of all its stakeholders throughout all its areas of operations. This commitment is based on the belief that business should be conducted honestly, transparently, fairly and legally.

The Company expects all employees, suppliers, contractors, and other stakeholders to share our commitment to implement the highest of moral, ethical and legal standards in our operating activities.

Human Rights Policy

The Company maintains a Human Rights Policy and commits to supporting, respecting and protecting internationally proclaimed human rights in alignment with the United Nations Guiding Principles on Business and Human Rights, International Labour Organization Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines for Multinational Enterprises, and as a signatory to the UN Global Compact, we work to incorporate the Ten Principles of the UN Global Compact in our strategy and operations.

Activities in 2024

In 2024, the Company considered its risk of exposure to modern slavery as low.

The business is in its early stages of its mine development and operational practices across multiple countries in East and Southern Africa.

During 2024 the Company's activities involved the re-start of 2 mines and associated processing plants and associated infrastructure construction in Tanzania and Zambia. The Company works with its local partners in each of these jurisdictions and with well-established service providers and consultancy groups, who themselves maintain their own policies and procedures for avoiding modern slavery.

The Company's business activities in these regions are all in the process of establishing its supply and logistics chains, and with suppliers that undergo thorough reviews by the Company's management of their

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business practices and policies. Whilst this minimises the risk of modern slavery, the Company continues to review and plan its activities in view of what future risks it might face.

The Company maintains a Sustainable Procurement Policy. This policy requires all suppliers not to engage in activities which may impact upon human rights, nor maintain poor ethical behaviours or pursue unfair business activities. All the Company's suppliers are subject to a review of their practices and sourcing procedures.

All the Company's management undergo periodic and regular training on human rights issues, including modern slavery as part of the Company's ongoing commitment to uphold and maintain the highest standards of human rights practices.

Risk Identification and Governance Process

The Board holds the responsibility for overseeing high Environmental, Social and Governance standards throughout the Company, and has established an Environmental, Social and Governance Committee, reporting to the Board, to oversee this.

The Company's CEO has ultimate responsibility for the delivery of Environmental, Social and Governance at every level of the business, but the delivery of high Environmental, Social and Governance requires all involved in the Company to demonstrate and implement these values and policies.

Although the Company's activities are at an early and developmental stage, it remains committed in making sure that even at this stage it addresses all the risks of modern slavery.

The Company's Board approved Human Rights Policy and Environmental, Social and Governance Policy includes a strategic commitment to integrate world leading practices and standards across all our business practices to protect the human rights of all our stakeholders.

Our ambition is to be a leader in our key areas of activities in addressing modern slavery.

Due Diligence

The Company continues to review and engage with all its stakeholders and supply chain and logistics providers to ensure an ongoing and regular risk review process.

This is completed to ensure that all parties understand the key criteria that is applied during the term of their contracts, work and on any future additional sourcing and supply of services.

All major providers of goods and service providers and consultants and contractors to the Company are required to have appropriate policies and procedures in place to address modern slavery and human rights risks.

Effectiveness and Public Release of Performance

The Company's adherence and performance in relation to its Human Rights Policy and Environmental, Social and Governance Policy involves a monitoring plan and overseeing key performance criteria across the area of modern slavery, as well as its broader Environmental, Social and Governance areas.



This work is reported on a frequent basis to the Environmental, Social and Governance Policy Committee, and to the Board.

The Company also published key results and criteria in its Annual Report.

Director and CEO

29th August 2025