GoldTerra Capital

CORPORATE GOVERNANCE POLICY

Anti-Slavery and Human Trafficking Policy

v. 1.3

04/04/24

GOLDTERRA CAPITAL

Anti-Slavery and Human Trafficking Policy

1. Purpose

Our gold mining investment company is committed to preventing modern slavery, human trafficking, and forced labor within our operations and supply chain. This policy outlines our commitment to ethical practices and compliance with relevant laws.

2. Scope

This policy applies to all employees, contractors, suppliers, and business partners associated with our investment company.

3. Policy Statement

3.1. Zero Tolerance

We have a zero-tolerance approach to modern slavery and human trafficking. We will not tolerate any form of exploitation, coercion, or forced labor.

3.2. Responsibilities

3.2.1. Management

- Senior management is responsible for implementing and enforcing this policy.
- They will ensure that all employees and stakeholders are aware of their responsibilities.

3.2.2. Employees

- All employees must adhere to this policy and report any concerns promptly.
- Employees should be vigilant and report any suspicious activities related to human trafficking or forced labor.

3.3. Due Diligence

3.3.1. Investment Decisions

- Before investing in any gold mining project, we will conduct due diligence to assess the risk of slavery and trafficking.
- We will evaluate the practices of the mining company and its supply chain partners.

3.3.2. Supplier Evaluation

- We will verify the ethical practices of suppliers and contractors.
- Suppliers will be evaluated based on their commitment to human rights and fair labor practices.

3.4. Training and Awareness

- Regular training programs will be conducted to educate employees and suppliers about modern slavery risks.
- Awareness campaigns will promote ethical behavior and vigilance.

3.5. Reporting and Investigation

- Any suspicions or incidents related to slavery or trafficking must be reported immediately.
- Investigations will be conducted promptly, and appropriate actions will be taken.

3.6. Continuous Improvement

- We will review and update this policy periodically to stay aligned with legal requirements and best practices.
- Feedback from employees, investors, and stakeholders will be considered for improvement.

GRAHAM GILMOUR
CEO
4th April 2024