	STANDARD POLICY	Document ID	TNCL-HRE-POL-0008
		Document owner	Human Resources Manager
	MODERN SLAVERY ACT POLICY	Revision	00
		Approve Date	13 th January 2026



MODERN SLAVERY ACT STATEMENT

At Tembo Nickel Corporation Limited, we take a zero-tolerance approach to modern slavery in our business or supply chains. We recognize the importance of ensuring that our business is conducted responsibly and in accordance with all applicable laws. Risk Management And Due Diligence We are looking to build and improve our systems to better (a) identify, assess and monitor potential higher risk areas in our supply chains, (b) mitigate the risk of slavery and human trafficking occurring in our supply chains through enhanced contract term controls (where appropriate), (c) train our employees on the risks and the need to manage them and (d) protect employees who raise concerns. Where possible, we ensure that expectations of business behavior are clear and consistent. We apply fair recruitment and employment practices so that work is voluntary and compensated. Implementation: Our Audit Committee takes responsibility for implementing this Modern Slavery policy. Any modern slavery issues will be reported back to the Audit Committee. We will utilize training on modern slavery issues, develop a system for supply chain identification, including adding modern slavery enquiries and monitoring information on incidents raised or alerts through our Whistleblowing platform; and reviewing our existing supply chains - ensuring appropriate contractual protections are in place with our key suppliers. We will provide regular training as necessary to educate on the importance of implementing and enforcing effective systems to ensure slavery and human trafficking is not taking place in our supply chain. If any modern slavery issues are identified these must be immediately reported to the Group General Counsel or via the Whistleblowing facility.



03/06/2026

Benedict Busunzu
CEO - Tembo Nickel.






9643-HR-POL-000021 TNCL Modern Slavery Policy

Final Audit Report

2026-06-03

Created:	2026-06-02
By:	Jacinta McDermott (jacinta.mcdermott@lifezonemetals.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAQ-hMGihRb9MvhuoxqY72D4PN4Jy4favQ

"9643-HR-POL-000021 TNCL Modern Slavery Policy" History

-  Document created by Jacinta McDermott (jacinta.mcdermott@lifezonemetals.com)
2026-06-02 - 12:32:27 PM GMT
-  Document emailed to Benedict Busunzu (benedict.busunzu@kabanganickel.com) for signature
2026-06-02 - 12:32:31 PM GMT
-  Email viewed by Benedict Busunzu (benedict.busunzu@kabanganickel.com)
2026-06-03 - 3:07:33 PM GMT
-  Document e-signed by Benedict Busunzu (benedict.busunzu@kabanganickel.com)
Signature Date: 2026-06-03 - 3:08:34 PM GMT - Time Source: server - Signature Appearance Selected: IMAGE
-  Agreement completed.
2026-06-03 - 3:08:34 PM GMT