

# 3<sup>rd</sup> YEAR ANTI-SLAVERY STATEMENT



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (*the Act*) and sets out the steps that Nord Gold SE (the *Company*) has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Nord Gold SE has a zero tolerance to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and striving to put effective systems and controls in place to safeguard against any form of modern slavery taking place within the business.

## About Nord Gold SE

Nordgold operates 10 mines (5 in Russia, 3 in Burkina Faso and one each in Guinea and Kazakhstan). It has several prospective projects in feasibility study, advanced and early exploration phases in Burkina Faso, Russia, French Guiana and Canada. Nordgold employs over 8,000 people.

## Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner, including:

**1. Structure of Supply chain and due diligence processes.** Aiming transparency in our supply chains, we conduct due diligence on everyone who wants to become our supplier. This due diligence includes an online search for a particular organisation's involvement in any offenses relating to modern slavery or people trafficking as well as any unethical behaviour towards employees or contractors.

**2. Anti-Bribery Policy (the ABC Policy).** Our ABC Policy clearly demonstrates our commitment to both high standards of corporate governance and to the principles of open and fair business. We strive towards the continuous improvement and enhancement of corporate ethics across all aspects of our operations.

In March 2019 the Policy was updated in order to reflect the latest developments in legislation and court practice.

**3. Code of business conduct (the Code).** The Code provides guidance on achieving the business goals of the Company and requires officers and employees to behave in an open, honest, ethical and principled manner. As part of its commitment to the Code, the company also established a Hot Line, which operates in three languages and can be used by any employee to report breaches of the Code.

**4. Whistleblowing policy.** We operate a Whistleblowing policy which provides a possibility for all employees and stakeholders including our contractors to raise concerns regarding questionable accounting, auditing, ethical, and other matters through the hot line.

There were no concerns with respect to modern slavery raised via hot lines in 2018.

**5. Regulation of Equipment, Materials and Services Purchasing process (the Regulation).** According to the Regulation, our security and business support team checks, *inter alia*, contractor's reliability and commercial reputation. In 2017 a supplier audit checklist, providing for guidance on how to identify the signs of modern slavery via respective questionnaires and site visits, was implemented.

**6. Risk Management Policy.** This policy prescribes for regular risk assessment and checks on measures established in the Company in order to ensure that the company takes all reasonable and cost effective steps in the identification, analysis and economic control of risks that could threaten business objectives of our group.

The Company undertakes regular and rigorous risk assessment related to modern slavery in accordance with our Risk Management Policy to provide monitoring and preventive measures where necessary.

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**7. Compensation and Benefits Policy. Recruitment Policy.** Both policies support company's compliance with the local labour legislation and international regulations, ensure that all forms of employment are duly formalised, and secure that slavery, servitude, human trafficking or forced labour are not taking place within the Company's group.

## **Training**

We continue an on-line training course tailored to the supply chain side of business, which gives all employees real life-scenarios and practical steps to identify and act on modern slavery abuses across supply chains. The course includes also a webinar on modern slavery.

In 2019 a training for our key suppliers will be held.

This will enhance our team's knowledge and understanding of the requirements under the Act, and ensure that we know how to identify areas of concerns and how to deal with them better.

The Company will keep updating its training procedures.

## **Approval for this statement**

This statement was approved by the Board of Directors of Nord Gold SE on 23rd May 2019.

## **For and on behalf of Nord Gold SE**

\_\_\_\_\_/Nikolay Zelenskiy/ CEO