

## KOCH METALS TRADING LIMITED MODERN SLAVERY ACT DISCLOSURE

This statement is made pursuant to Section 54 (Part 6) of the Modern Slavery Act 2015 ('Act') by Koch Metals Trading Limited (KMTL) for the financial year ending 31<sup>st</sup> December 2025.

### **Internal Management Procedures**

KMTL is a UK registered commodities trading company. The company acts as a principal in the traded markets of physical and derivative commodity products including base metals. KMTL is not aware of major internal or external risks in relation to human trafficking/slavery in the trading of these commodities.

KMTL is committed to conducting all business lawfully and with integrity. KMTL's commitment to and expectations for ensuring that our business and supply chain is maintained in a lawful and socially responsible way includes, among other things, that neither human trafficking nor slavery/forced labour is taking place in any part of our business, and that our suppliers not use forced labour in any of its forms, including human trafficking and slavery, to produce the products they provide to KMTL. KMTL's compliance and ethics expectations are set out in the Koch Code of Conduct (<https://codeofconduct.kochinc.com/>), and in training and other communications we provide to our own employees, officers, advisers, agents and representatives, as well as our suppliers and other third parties.

### **Supplier/Supply Chain Management**

Evidence of the management of our compliance and ethics expectations in relation to human trafficking and slavery/forced labour in our supply chains can be found in Koch's Code of Conduct, which states:

We are committed to adhering to applicable employment and labor laws everywhere we operate. This includes observing those laws that pertain to child labor, forced labor, human trafficking, wages, work hours, and freedom of association. In addition to other expectations, our commitment to social responsibility specifically includes the following:

#### **Child Labor**

The company will not employ child labor. What constitutes child labor is defined by applicable child labor laws, or where such laws are not in place, employees will not be permitted to work in a position where they are younger than the minimum local legal age for employment in that particular job. The company will adhere to all applicable laws and regulations which govern employment terms and conditions for minors. Minor is defined as an individual who is under the age of adulthood as defined by applicable law.

#### **Forced Labor and Modern Slavery**

The company prohibits the use of forced labor, human trafficking, or involuntary prison labor. Recruiting and selection activities are conducted in compliance with applicable law and any applicable collective bargaining obligations.

Many of KMTL's commercial agreements require supplier compliance with applicable laws and regulation.

## **Supplier Audits**

Due to the perceived low risk, KMTL does not have a supplier certification process specifically focused on human trafficking and slavery.

## **Direct Supplier Certification**

Due to the perceived low risk, KMTL does not have a direct supplier certification process specifically focused on human trafficking and slavery.

## **Accountability Standards**

Non-compliance with laws, regulations and our standards regarding human trafficking and slavery – whether by a supplier or an employee – will result in corrective action, up to and including termination of the relationship, depending on the circumstances. The Koch Code of Conduct identifies numerous avenues for reporting compliance concerns, including on an anonymous basis (where allowed by law). Such concerns are objectively investigated under the guidance and direction of our compliance or legal departments. KMTL prohibits retaliation against anyone who, in good faith, raises a concern.

## **Training on Human Trafficking & Slavery**

Due to the perceived low risk, KMTL does not have a comprehensive, mandatory training program focusing on human trafficking and slavery.

## **Verification**

Other than the steps and practices described above, due to the perceived low risk, KMTL does not have a separate, comprehensive verification process for evaluating and addressing the risks of human trafficking and slavery.

This disclosure applies to the practices of Koch Metal Trading Limited (KMTL).

This statement is made and reflects the position as of 13 May 2026 and has been approved by the Board of Koch Metals Trading Limited (KMTL).

Date: 5/13/2026 | 8:35 AM PDT

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*Daniel Simon Eld*

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Daniel Eld

Director

Koch Metals Trading Limited