



**CAPITAL**

**SLAVERY AND HUMAN TRAFFICKING STATEMENT PURSUANT  
TO SECTION 54 OF THE MODERN SLAVERY ACT 2015**



## **INTRODUCTION FROM THE EXECUTIVE CHAIRMAN - JAMIE BOYTON**

We, Capital Limited, its subsidiaries and any companies in which Capital has an interest, (collectively referred to as “**Capital**”) are committed to highest standards of integrity and accountability implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in its own business or in any of its supply chains.

This statement highlights the key activities we have undertaken during this financial year to combat modern slavery in our organisation and supply chain, including putting a formal anti-slavery and human trafficking policy in place and updating our Procurement Policy and any pro-forma documents, which are relevant in establishing and maintaining relationships with suppliers and other third parties.

## **ORGANISATION STRUCTURE AND BUSINESS**

Capital is a global a leading mining services company providing a complete range of drilling, mining, maintenance, and geochemical laboratory solutions to customers within the global minerals industry, focusing on the African markets. Capital’s corporate headquarters are in Mauritius and it has established operations in Burkina Faso, Côte d’Ivoire, Egypt, Guinea, Kenya, Mali, Mauritania, Nigeria, Saudi Arabia and Tanzania. We have a global annual turnover of USD \$226.8m and over 2,000 employees worldwide.

Capital’s services include: exploration, delineation and production drilling; load and haul services; mining equipment hire and maintenance; and geochemical analysis.

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We have appropriate policies in place that underpin our commitment to ensure that no modern slavery or human trafficking takes place anywhere in our supply chains or in any part of our business. Our zero-tolerance approach to modern slavery reflects our commitment to maintaining the highest standards of integrity and accountability in our business affairs We have the following policies in place relevant to modern slavery, which we continuously review and update:

- Code of Business Conduct and Guidelines thereto;
- Anti-Slavery and Human Trafficking Policy;
- Grievance Procedure and Whistleblowing Policy; and
- Procurement Policy.

These are located in our Corporate Governance Section at:  
<https://www.capdrill.com/investors/corporate-governance>

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

We recognise that we operate in countries where there is a medium to high risk of modern slavery (e.g. Burkina Faso, Côte d’Ivoire, Egypt, Guinea, Kenya, Mauritania, Nigeria, and Tanzania) and that the mining industry, in particular, in Africa, is in particular prone to modern slavery issues.

As part of our initiative to identify and mitigate risk, we have put the following due diligence procedures in place within our organisation:

- Due diligence questionnaires for potential suppliers

- Inclusion of robust anti-modern slavery clauses in all supply contracts and any other agreements with suppliers, vendors and others.

We also have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Investigating potential breaches to help ensure compliance with our anti-slavery and associated policies; and
- Protect whistle blowers.

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes. We expect that our suppliers will hold their own suppliers to the same high standards.

We includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, in our agreements with suppliers, to ensure that all those in supply chain comply with our zero tolerance approach to modern slavery and human trafficking.

We have a dedicated compliance officer. The overall responsibility has been delegated to the Sustainability Committee, which consists of involvement from the following departments:

- Legal;
- Commercial/Finance
- Human resources;
- Supply Chain; and
- Contracts and Tenders

### **TRAINING**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff.

### **OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING**

Capital is currently in the process of introducing key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2021. It was approved by the Board on 7 March 2022.



Jamie Boyton  
Capital Limited  
7 March 2022