

Arise P&L – Modern Slavery and Human Trafficking Statement

For the financial year ended 31 December 2024

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015 on behalf of **Arise P&L Limited (“Arise P&L”)** and its subsidiaries. It sets out the steps taken during the 2024 financial year to prevent modern slavery and human trafficking within our business and supply chains.

Modern slavery, including slavery, servitude, forced labor, and human trafficking, constitutes a serious violation of fundamental human rights. Arise P&L maintains a zero-tolerance policy toward any form of human rights abuse within its operations or supply chain. The Group is committed to upholding the highest ethical standards and will rigorously address any allegations of non-compliance.

1. Our Structure, Operations and Supply Chains

Arise P&L is a UK-registered holding company that develops and operates industrial ecosystems across Africa. We design, finance, and deliver interconnected infrastructure that enables efficient logistics solutions for our partners.

Our portfolio currently comprises three port assets located across Gabon and Côte d’Ivoire, in which Arise P&L holds a 66.34% to 80% percent ownership interest.

Our principal supply chains include:

- **Construction and expansion projects**, requiring engineering, civil-works and material supply;
- **Operational procurement**, such as port equipment, spare parts, and technical services.
- **Service providers**, including maintenance, security, cleaning, stevedoring, and logistics contractors.

Because of the labor-intensive and multi-tiered nature of these activities, we recognise an elevated risk of modern slavery during major construction projects and within outsourced operational services.

2. Policies and Governance

Arise P&L operates under the **ARISE Group Policy Manual**, which applies to all employees,

subsidiaries and controlled contractors. The Manual expressly prohibits child labour, forced labour, debt bondage, and human trafficking in any part of our operations or supply chain.

All managers, supervisors, and worker representatives receive training on these standards.

Key supporting policies include:

- **Supplier Code of Conduct**, requiring suppliers to avoid child, forced, or involuntary labour and to uphold fair treatment of workers.
- **Whistleblowing Policy**, providing confidential channels for reporting concerns;
- **Health, Safety and Environment Policy** and **ESG Policy**, reinforcing respect for human rights;
- **Procurement Policy**, integrating social and ethical criteria into supplier selection.

Governance oversight rests with the Board Audit & Risk and Compliance Committee (BARCC) and the Human Resources Committee (HRC), which review modern-slavery and grievance matters quarterly.

3. Responsibilities and Oversight

Responsibility for preventing modern slavery is embedded across the Group:

- **Business Unit Heads** at each port are accountable for local implementation and compliance;
- **Human Resources teams** manage grievance mechanisms and address any labour-related concerns;
- **Legal teams** ensure all suppliers and contractors sign the Supplier Code of Conduct and that contracts include appropriate clauses;
- **Group COO** serves as the executive owner for modern-slavery compliance and reporting.

4. Risk Assessment and Due Diligence

We assess inherent risk by considering geography, sector, labour model, and supplier tier. Our highest-risk areas are large-scale construction works and long-term outsourced services.

Key mitigation measures include:

- **Single EPC Contractor Model:** For major projects, we appoint a single Engineering, Procurement and Construction (EPC) contractor responsible for its subcontractors. Each

must comply with the Supplier Code of Conduct.

- **Project Management Consultants:** Independent consultants monitor EPC performance, including labour-management and modern-slavery provisions.
- **Supplier Engagement:** Seminars and onboarding sessions are held with key suppliers to communicate labour, health and safety, and ethical-procurement standards.
- **Employee Induction:** Every employee receives the Group Code of Conduct during onboarding, reinforced through workplace noticeboards outlining labour rights.

5. Monitoring, Auditing and Grievance Mechanisms

Our **Legal and HR teams** conduct periodic audits of long-term contractors, reviewing compliance with national labour legislation and Arise P&L standards. Reviews include:

- verification of wage payments and working hours;
- confirmation that medical checks and welfare facilities meet statutory requirements.
- evidence of absence of child labour and coercion.

We operate a **worker and community grievance mechanism**, enabling any individual to raise concerns confidentially. Reported issues—including whistleblowing cases—are reviewed quarterly by both port-level and Group-level committees.

We also maintain regular engagement with **employee unions** and **health and safety committees** and collaborate with **Labour Ministries** in Gabon and Côte d'Ivoire to ensure full compliance with local law.

6. Prevention of Human Trafficking at Ports

Given our operational context, we recognise the potential intersection between port security and human trafficking. Each port operates under the **International Ship and Port Facility Security (ISPS) Code**, governed by the International Maritime Organization.

Key safeguards include:

- Certified **Port Facility Security Officers** trained by government authorities;
- **Port Facility Security Plans and Assessments**, reviewed annually;
- Strict **access controls**, vessel checks, and cooperation with customs and border agencies;
- External audits and re-certification every three years.

These measures significantly reduce the risk of ports being misused for trafficking or other illicit activities.

7. Training and Awareness

During 2024, seminars were held for procurement and project teams focusing on labour-management standards and the Supplier Code of Conduct. HR staff and site supervisors also received refresher sessions on recognising indicators of forced or child labour and how to escalate concerns.

Our 2025 training plan includes digital refresher modules for all employees and expanded supplier awareness sessions in both operating countries.

8. Effectiveness and Next Steps (2025 Plan)

We track our progress through periodic internal reporting and committee oversight.

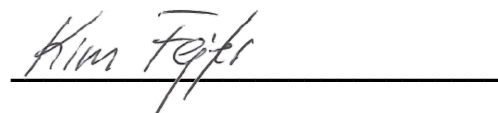
Priorities for 2025 include:

- Preventing Discrimination and Harassment, Whistleblowing, Health and Safety at Workplace.
- Including modern-slavery risk in internal audit scopes.
- Continue to update quarterly grievance summaries to the BARCC and HRC.

We will continue to refine our approach in line with Home Office guidance and stakeholder expectations.

9. Approval and Signature

This statement was approved by the **Board of Directors of Arise P&L Limited** on 30th October 2025 and signed on its behalf by:

A handwritten signature in black ink, appearing to read "Kim Fajr", is written over a solid black horizontal line.

Director

Date:

Publication Note

This statement is published on the Arise P&L website in accordance with section 54(7) of the Modern Slavery Act 2015. Previous statements (2020–2023) were published as part of the Group Annual Reports.

Disclaimer

This statement has been prepared to meet the requirements of the UK Modern Slavery Act 2015. It does not constitute legal advice, and Arise P&L encourages readers to consult independent counsel regarding specific compliance obligations.