

Darton Group Ltd

Slavery and Human Trafficking Statement for the financial year ended 31 December 2024

Organisation, Structure and Business

Darton Group Ltd through its main operating company Darton Commodities Ltd (“DC”) (taken together the “Group”) provides metals and metallic raw materials to industry and carries out and sells in depth research into the cobalt market and supply chain.

The Group has 7 employees in England and The Netherlands.

All handling, storage, freight forwarding, and customs clearance is performed on behalf of the Group by approved subcontractors.

Code of Conduct

The Group is committed to operating in a responsible way which includes treating people with dignity and respect in the workplace and in the communities where it does business, as well as the respect and protection of human rights.

The Group and its staff operate to the highest ethical and compliance standards for conducting business. This is set out in the “Code of Conduct” published on the Group’s website.

Operating Responsible Supply Chains

The Group believes responsible supply chains must respect people and human rights, promote good practices, provide viable livelihoods and reduce environmental impacts.

The Group believes it is essential that all parties in the supply chain – industry, governmental and non-governmental organisations (NGOs) – work together to address this complex problem and support workers livelihoods, raise incomes and ensure children and adults are not subject to unacceptable conditions.

DC is a member of the London Metal Exchange, The Cobalt Institute and the Minor Metal Trade Association all of whom promote improvements in ethical and responsible business practices.

Policies on Modern Slavery

The Group does not accept or support the use of illegal, abusive, enforced or child labour and abides by the laws in the countries it operates and often exceeds applicable local, state and national laws and regulations regarding employment and the employment of minors.

Due Diligence

The Group, in running its business, making enquiry and carrying out and maintaining in depth market research, closely monitors the performance of the various supply chain participants industry wide and specifically in the Groups supply chain to ascertain that those actors are themselves operating responsible supply chains.

Risk Assessment and Measuring Effectiveness

The Group is confident that it continually monitors and assesses the risk in its supply chain and that it is effective in ensuring that the standards by which it operates are met.

The Group will not deal directly or indirectly with any party that does not meet the required standards.

Training for Staff

The Group ensures that its staff are well versed in and abide by its policies on Responsible Supply Chains and its Code of Conduct. These are regularly discussed internally with staff.

Raising Grievances

The Group takes all reports of potential misconduct seriously and handles them promptly, fairly, and confidentially.

Any grievance, complaint or concern from external parties and employees may be submitted anonymously to the Directors.

The Group will not tolerate retaliation against anyone who, in good faith, raises a concern or participates in an investigation.

This Statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Directors of Darton Group Ltd.

Roy Walton
Director

26 February 2025