

Prevention of Modern Slavery Statement

About this Statement

It continues to be a priority for Atalaya Mining Copper, S.A. (the “Company”) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and supply chains. The company has prepared this Modern Slavery Statement (Statement) to meet the requirements of the UK Modern Slavery Act 2015 (the UK Act) for the reporting period 1st January 2025 to 31st December 2025.

This Statement was approved on 24 June 2026 by the Board of Directors of Atalaya under section 54(6)(a) of the UK Modern Slavery Act.

Our business

Atalaya Mining Copper, S.A. is a European copper producer with operations in Spain, focused on the production of copper and other critical metals that support modern economies and the energy transition. Our business operates mining projects at different stages of development: *Proyecto Riotinto* (Huelva) is currently our only mine in operation. Our development projects include *Proyecto Touro* (Galicia), *Proyecto Masa Valverde* (Huelva) and *Proyecto Ossa Morena* (Extremadura).

In 2025, Atalaya employed 514 people, excluding senior management. Operational activities at Proyecto Riotinto are supported by third party contracting firms, engaged under formal agreements. In 2025, approximately 774 contractor employees supported Proyecto Riotinto.

More than 90% of Atalaya’s workforce is based at Proyecto Riotinto, with 68% residing locally and 93.4% with permanent contracts, demonstrating Atalaya’s preference towards stable, local employment. These roles include managerial, technical, operational and administrative staff.

Our supply chains

Atalaya supports the local and regional economy by purchasing from local suppliers and promoting auxiliary companies that increase their turnover, thanks to the creation of synergies in our areas of operation.

In 2025, Atalaya worked with 636 suppliers and contractors, of which 89.20% were Spanish, 6.93% were from elsewhere in Europe and 3.87% from outside Europe — representing 96.63% European procurement overall. The predominantly domestic nature of our supply chain significantly reduces our exposure to modern slavery risk, given Spain's stable political and economic environment and strong labour law framework¹.

We are committed to prioritising sourcing and subcontracting from local companies with a view to contributing to the local economy and bringing value to the communities in which we operate. We pay particular attention to suppliers operating in regions with lower regulatory maturity or higher ESG exposure, including those involved in transport and logistics, where complex operating environments can create additional risks.

Our policies on slavery and human trafficking

We have policies and procedures in place that reflect our commitment to ensuring that modern slavery and human trafficking are not present in our supply chains or in any part of our business. We regularly review and update all our policies and procedures.

Our [Prevention of Modern Slavery Policy](#) reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In addition, our [Code of Business Conduct & Ethics](#) prohibits child labour, forced labour and all forms of exploitation. It requires all suppliers to uphold and protect internationally recognised fundamental human rights in all activities. Our [Anti-Bribery & Anti-Corruption Policy](#) and [Whistleblower Policy](#) further support our efforts to prevent modern slavery.

As members of the United Nations Global Compact (UNGC), we are committed to compliance with the Human Rights Principles (Principles 1 and 2), derived from the Universal Declaration of Human Rights. The company conducts its activities with the utmost respect for its employees and society at large, adhering to the Universal Declaration of Human Rights of the United Nations, the Fundamental Conventions of the International Labour Organization (ILO).

¹ Walk Free Global Slavery Index - <https://www.walkfree.org/global-slavery-index/map/#mode=map:country=ESP:region=4:map=prevalence:year=2023:view=recommendations>

Due diligence processes for slavery and human trafficking

We are committed to respecting all human rights, including the right to freedom from slavery. In 2025 we continued to strengthen our supplier due diligence processes significantly. All new suppliers are required to complete a formal application form and onboarding process before entering into a business relationship with us. This form includes a dedicated ESG section covering the supplier's policies and procedures on sustainability, human rights and ethical conduct. The supplier application form was developed in collaboration with our Compliance and ESG teams and includes explicit references to modern slavery and human trafficking, alongside broader ESG and sustainability requirements.

Building on the rollout of our new supplier portal, we bolstered ESG screening across all critical and large suppliers. Our due diligence checks cover financial solvency, compliance, human rights, safety performance, environmental management and reputational risk.

We also enhanced traceability and ethical sourcing through independent third-party audits of higher risk international suppliers. Where concerns related to modern slavery are identified through supplier audits or inspections, these are managed through our internal Compliance function, which oversees the supplier onboarding and monitoring process.

In 2025, one such inspection was carried out by SGS - the world's leading testing, inspection and certification company - in Gujarat, India, to inspect a materials supplier. These field inspections verify working conditions, safety practices and environmental standards at origin.

In 2025:

- 21 suppliers were assessed for environmental impacts on site
- 78 suppliers were assessed for social impacts (Health & Safety) on site

Where issues are identified, we engage directly with suppliers to set the process on track. We maintain the option to reassess or discontinue relationships where expectations are not met.

In 2025, no incidents of modern slavery were identified in our operations or supply chain.

Risk Assessment and Management

We operate in Spain which is a jurisdiction characterised by stable political and economic conditions, with a low risk of modern slavery, as assessed by the [Walk Free Global Slavery Index](#). Spain's robust regulatory and labour law framework, combined with the predominantly domestic nature of our supply chain, means our inherent risk exposure to modern slavery is considered low.

The Board has oversight of sustainability and human rights matters, including modern slavery, through the Sustainability Committee. The Sustainability Committee reviews and approves policies and practices related to sustainability, including human rights, and is responsible for the annual Modern Slavery Statement.

Nonetheless, we recognise the possibility of being linked to modern slavery practices through our supply chain, particularly through international suppliers. We have therefore refined our supplier categorisation model to provide a clearer and more rigorous assessment of supplier risk and criticality, enabling us to identify where ESG risks may be more prevalent and tailor our engagement accordingly.

We pay particular attention to suppliers involved in transport and logistics and those operating in jurisdictions with lower regulatory maturity, where we carry out enhanced due diligence, including on-the-ground verification where appropriate.

Key Performance Indicators

We are committed to measuring our effectiveness in combating slavery and human trafficking. Our current indicators include:

- Number of suppliers assessed for environmental impacts on site: **21** (2025)
- Number of suppliers assessed for social impacts (H&S) on site: **78** (2025)
- Incidents of modern slavery identified in operations or supply chain: **0** (2025)
- Percentage of European procurement: **96.63%** (2025)

We are working to develop further KPIs to be reported in future statements.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking, we provide training to all our staff on modern slavery awareness as part of our compliance training programme.

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship and reinforced as appropriate on an ongoing basis, including through our supplier application process and Code of Business Conduct & Ethics.

Grievance mechanisms and remedies

We encourage any concerns related to suspected modern slavery to be reported without delay or fear of retaliation through our Ethics and Whistleblowing Channel, which is managed by an external company, to reinforce confidentiality and good faith.

Further steps

As part of our ongoing commitment to prevent modern slavery and human trafficking, the Company will:

- Finish evaluating 100% of Atalaya's critical and important suppliers through our ESG screening portal
- Continue with the evaluation of non-critical suppliers
- Extend the functionality of the supplier portal
- Broaden the number of suppliers subject to periodic audits, strengthen traceability requirements and further integrate ESG indicators into supplier performance reviews
- Continue to educate personnel and promote the Company's Whistleblower Policy, encouraging all employees and those working on our behalf to raise any concerns

*This statement has been signed by **Alberto Lavandeira***

"Alberto Lavandeira"

CEO, Atalaya Mining Copper, S.A.