

## Anti-Slavery & Human Trafficking Policy

Effective Date: January 5th, 2026

Last Reviewed: January 5th, 2026

Next Review Date: January 5th, 2027

### 1. Purpose

Legacy Energies Inc. is committed to ensuring that slavery and human trafficking have no place in our business or supply chains. This policy aligns with international laws such as the UK Modern Slavery Act 2015, the US Trafficking Victims Protection Act (TVPA), and relevant international conventions. We adhere to the UN Guiding Principles on Business and Human Rights and other frameworks that support the eradication of modern slavery.

### 2. Scope

This policy applies to all employees, officers, directors, contractors, suppliers, and third-party representatives working on behalf of Legacy Energies Inc. It governs activities in every jurisdiction where Legacy operates, including both direct and indirect operations.

### 3. Policy Statement

Legacy Energies Inc. has zero tolerance for modern slavery, including forced labor, bonded labor, involuntary servitude, child labor, and human trafficking. We are committed to implementing effective systems and controls to ensure that slavery and human trafficking do not occur within our operations or our supply chains.

### 4. Definitions

- **Modern Slavery:** The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services through the use of force, fraud, or coercion.
- **Human Trafficking:** The illegal movement of people, typically for the purposes of forced labor or sexual exploitation.
- **Forced Labor:** Work or service which people are forced to do against their will under the threat of punishment.
- **Bonded Labor:** Workers are forced to work to repay a debt and are not permitted to leave until the debt is paid.

### 5. Key Commitments

#### 5.1 No Forced or Bonded Labor:

Legacy Energies strictly prohibits the use of any form of forced labor, bonded labor, or involuntary servitude in its operations and supply chains. All work performed within the company must be voluntary, and workers must be free to terminate their employment at any time.

#### 5.2 No Child Labor:

Legacy adheres to the International Labour Organization (ILO) Conventions 138 and 182, which

prohibit child labor in hazardous conditions. No person under the age of 18 shall be employed in hazardous work, and all minors will be employed in accordance with local labor laws.

### 5.3 Supplier Compliance:

We require all our suppliers and contractors to comply with our Anti-Slavery Policy. This includes conducting due diligence and audits of their own supply chains to ensure they are free from slavery and human trafficking.

### 5.4 No Recruitment Fees:

Legacy does not charge or allow the charging of recruitment fees to workers. We ensure that all workers are hired through ethical recruitment practices, and no fees are imposed on job applicants for the opportunity to work.

## 6. Supply Chain Due Diligence

### 6.1 Risk Assessment:

Legacy conducts thorough risk assessments to identify regions and operations where there is a higher risk of slavery or human trafficking. High-risk areas may include regions with weak labor laws or known human rights abuses in supply chains.

### 6.2 Supplier Audits and Monitoring:

We conduct regular audits of our suppliers and contractors, with a particular focus on high-risk regions. These audits assess labor practices, working conditions, and compliance with anti-slavery standards. Non-compliance will result in corrective action or the termination of contracts.

### 6.3 Contractual Obligations:

All supplier contracts will include clauses that enforce adherence to anti-slavery and human trafficking laws. Suppliers are required to maintain records of compliance and to cooperate with any audit or investigation initiated by Legacy.

## 7. Reporting Mechanisms

### 7.1 Grievance and Whistleblowing Procedures:

Legacy Energies provides multiple confidential channels through which employees, contractors, and external stakeholders can report concerns regarding slavery or human trafficking. These include:

- Confidential Email: [compliance@legacyhenergies.com](mailto:compliance@legacyhenergies.com)

All reports will be thoroughly investigated, and corrective action will be taken where necessary.

### 7.2 Non-Retaliation:

We guarantee that individuals who report concerns in good faith will not face retaliation. This policy applies equally to employees, contractors, and other third-party stakeholders.

## 8. Training and Awareness

### 8.1 Employee Training:

All employees will receive training on the risks of modern slavery and human trafficking. Training will include identification of warning signs, understanding the legal requirements, and knowing how to report concerns.

### 8.2 Supplier Training:

We require that key suppliers, especially those operating in high-risk regions, undergo training to

ensure they understand our anti-slavery policies and their responsibilities.

## 9. Monitoring and Continuous Improvement

### 9.1 Internal Monitoring:

Legacy will continuously monitor its operations and supply chains for any potential slavery or trafficking risks. Any gaps identified through audits, reports, or investigations will be addressed immediately.

### 9.2 Policy Review:

This policy will be reviewed annually, or sooner if necessary, to ensure compliance with new legal requirements, best practices, and audit findings.

## 10. Accountability and Consequences for Non-Compliance

### 10.1 Accountability:

All managers and department heads are responsible for ensuring that this policy is implemented within their areas of responsibility.

### 10.2 Consequences for Non-Compliance:

Any employee, contractor, or supplier found to be in violation of this policy will face disciplinary measures, including termination of employment or contracts. Legal action will also be pursued in cases of serious violations.