

Anti-Slavery Statement & Policy

First Graphene Limited (Company)

Statement on Modern Slavery and Human Trafficking

First Graphene Limited and its subsidiaries, (FGR) are committed to social and environmental responsibility and to the fair and humane treatment of people in its employment and in its supply chains. This statement sets out the steps FGR has taken during the financial year ended 30 June 2019 to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its own business.

Organisational structure and supply chains

FGR is the world leader in the commercial-scale manufacture of high-quality graphene products, with operations in the Australia, UK and Sri Lanka. As such, FGR's own business operations and supply chain consists primarily of office-based professionals, with only very limited exposure to areas with a greater risk of modern slavery, for example, cleaning services, and travel and accommodation providers.

Policies

It is our belief modern slavery and human trafficking are abhorrent practices which will not be tolerated in our own operations or in our supply chains, and we will take such steps which are reasonable to ensure none is present. We are committed to working ethically and with integrity and we require our business partners to do the same.

FGR has an Anti-Bribery policy and a Code of Conduct which require FGR to act ethically and with integrity, and systems have been put into place to make it easy for our employees to disclose any concerns they may have regarding slavery and human trafficking within the Group. Employees are also encouraged to report any concerns about slavery or human trafficking that they may suspect or may have witnessed outside of the Group, whether or not they have become aware of such during the performance of their employment.

Risk assessment and due diligence process

We have conducted an assessment of the risks, both external and internal, of slavery and human trafficking, including country risks, sector risks and business partnership risks within its own operations and in its supply chain and we have determined none of our own business operations are undertaken in higher risk areas, whether by reference to geographical location or business sector.

Where we have identified higher risk areas in our supply chains, appropriate due diligence has been undertaken to satisfy ourselves the parties concerned have in place ethical employment practices which comply with all relevant legislation including, where applicable, the making of an Anti-Slavery statement pursuant to the Modern Slavery Act 2015. Where suppliers have not published an Anti-Slavery Statement, they are required to confirm they have in place such ethical employment practices and they, in turn, require their suppliers to have the same.

Future steps

Throughout the 2019/20 year, FGR will continue to monitor the risk of slavery and human trafficking in its supply chains and its own business, and we will act and report accordingly.

This statement is made pursuant to s.54 (1) of the Modern Slavery Act 2015 and constitutes Slavery and Human Trafficking statement for the financial year to 30 June 2019. It has been approved and authorised by the Board of Directors of First Graphene Limited.

Approved by the Board of Directors of First Graphene Limited on 12 September 2019