

Molten Ventures plc Modern Slavery and Human Trafficking Statement for the Financial Year ended 31 March 2023

1. Introduction

Molten Ventures plc ("**Molten**"), for and on behalf of itself and its broader group, is committed to carrying out business responsibly, which includes ensuring that modern slavery and human trafficking are not taking place in any part of our business or supply chain.

This Statement is provided by Molten Ventures plc, for and on behalf of its corporate group (collectively referred to in this Statement as the "**Molten Group**", "**we**", "**us**" or "**our**") in accordance with the UK Modern Slavery Act 2015 to describe the steps we have taken to combat modern slavery and human trafficking in in our organisation and our supply chain during the Financial Year ending 31 March 2023.

2. What is Modern Slavery?

Modern slavery is an international crime which affects an estimated 40 million individuals around the world but remains a largely hidden blight on our global society. Victims of any age, gender, and ethnic background have been, and continue to be, forced to work illegally against their will across many different sectors including construction, retail, hospitality, agriculture and manufacturing. We have a responsibility to be alert to the risks, however small these may be, in our business and in our wider supply chain.

3. Our Business

Molten is a leading European venture capital business investing in European high growth technology companies to generate capital growth for shareholders and investors, with a focus on four sectors of the digital economy: Enterprise; Digital Health & Wellness; Hardware & DeepTech; and Consumer Technology.

The Group comprises FCA-regulated fund managers, alternative investment funds and operational entities, all of which sit underneath Molten Ventures plc whose shares were during the period traded on the Main Market of the London Stock Exchange and the regulated market of Euronext Dublin¹. Molten's shareholders include institutional investors, including private and public pension funds and insurance companies.

4. Our Policies & Commitments

We do not tolerate any form of modern slavery or human trafficking in any part of our business and we are committed to implementing and improving our practices designed to combat modern slavery and human trafficking in our supply chains and our investment activities.

Our policies and commitments, along with the due diligence, training, and future plans described in this Statement reflect our ongoing commitment to act ethically and with integrity in our business relationships and to monitor our internal systems to prevent modern slavery and human trafficking in our business and supply chains.

We observe all international standards and principles relating to human rights within our business, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the Children's Rights and Business Principles.

As an investor with a stated commitment to responsible investment and integration of Environmental, Social and Governance ("**ESG**") considerations into our activities, we recognise the importance of engaging with the companies in which we invest to encourage them to take steps to adopt responsible supply chain processes.

In furtherance of our commitment to ESG, we have been signatories to the UN Principles of Responsible Investment ("**PRI**") since 2019 and report on an annual basis. We continue to implement our Group ESG Policy, a copy of which can be found on the 'Sustainability' section of our website at <https://investors.moltenventures.com/sustainability>. Within our ESG Policy, the exclusion list confirms that we will not invest in sectors, businesses or activities which have modern slavery, human trafficking, forced or compulsory labour, or unlawful / harmful child labour as their objective or direct impact. The implementation of the ESG Policy is overseen by the Board through the ESG Committee, which was formed in March 2022. A copy of our Sustainability Report for the period can also be found on the Sustainability section of our website linked above.

5. Key risks & risk management strategies

We strive to ensure that any risks and opportunities associated with modern slavery or human trafficking are managed consistently across the Molten Group and that our policies are implemented across our companies, locations and suppliers. We regularly review the implementation of our standards to identify and address areas for improvement.

¹On 23 July 2021, Molten (formerly Draper Esprit plc) de-listed from the AIM Market and its share capital was admitted to trading on both the LSE main market and on Euronext Dublin.

Molten

During the period to which this Statement relates, we have assessed that the likelihood of direct modern slavery risks for **our own people**, including prospective hires, continues to remain low, due to the nature of our business, our regulatory requirements and our internal vetting and onboarding process. As part of our onboarding and ongoing HR process we ensure that all our staff have the right to live and work in the UK and adhere to certain minimum standards of conduct. Further details of the policies and standards we apply for our all our people are set out below.

In respect of **our suppliers**, we have assessed the risks of modern slavery or human trafficking arising and do not consider that any of our key relationships with professional or business service suppliers give rise to material risks. It is therefore also considered to be low risk. The most pertinent area of risk in our supply chain exists in connection with our facilities management, catering and courier services, which we mitigate through usage of reputable suppliers under suitable contractual terms. More details are set out below.

The **portfolio companies** in whom we invest are typically early or growth stage technology-focussed businesses with global ambitions, some of which may have a hardware element to their product/service offering. The nature of these growth-driven business models will often involve a multi-jurisdictional aspect, either by virtue of direct business operational requirements, or indirectly through supply-chain exposure. Depending upon the countries to which portfolio companies are exposed, there may be an increased risk of modern slavery or human trafficking.

This is an area of focus for Molten and we are committed to building awareness and monitoring risks associated with modern slavery throughout our portfolio.

6. Our People

We recognise the value of human relationships and put people at the heart of our business. We seek the brightest and the best, whoever they are and whatever their background, and seek to treat all staff fairly and consistently by operating a workplace and business environment that is open, transparent and trusted.

Aligned with this approach, all members of the Molten Group are required to conduct their activities in accordance with our codes and policies, including our Health & Safety Policy, Anti-Harassment and Bullying Policy and Diversity, Equality, Inclusion and Equal Opportunities Policy. We also have a Whistleblowing Policy for staff to raise any suspected wrongdoing in the organisation in place which was updated during the period to make it easier and clearer for personnel to raise concerns.

We require our personnel to act according to the highest standards of honesty and integrity as well as comply with all legal and regulatory requirements, which extend to the protection of human rights and the prohibition of forced labour and human trafficking.

7. Our Supply Chains

Molten expects its suppliers to treat workers and employees with respect and fairness; to have suitable anti-modern slavery and human trafficking policies and procedures in place; and to act and in accordance with applicable laws.

As a venture capital business, our supply chain is not particularly extensive, and comprises predominantly business and professional services. To ensure alignment between our values and ethics and those of our suppliers, we use reputable suppliers, typically established in the UK under suitable contractual terms of engagement.

If we find breaches of anti-human trafficking and anti-modern slavery laws within our supply chain, we will look to support businesses in their efforts to comply with such legislation, or if we discover any matter that we believe may constitute a supplier's serious or irremediable breach, we would, upon legal advice, consider suspension or termination of the impacted relationship.

In the financial year ended 31 March 2021, we introduced a clause into the majority of new/renewed material supply agreements which obliges our providers to contractually commit to the prevention of modern slavery and human trafficking. We have also requested an associated "right to audit" clause to allow for oversight of compliance with these provisions.

We will continue to monitor and engage with our suppliers on modern slavery and further embed this into our supplier engagement and procurement processes. We remain committed to conducting a review of the locations and practices of our suppliers, which was not completed during the previous period.

8. Our Investment Activities & Portfolio Companies

For the companies which we invest in, we carry out legal, commercial and compliance due diligence at the point of investment, including consideration of the nature of business operational activities undertaken and the engagement of personnel directly or through the supply chain.

In the prior financial reporting period, we successfully rolled out our ESG Policy and deal checklist (including a dedicated ESG section) for primary investments directly held by Molten Ventures plc. The evolution of our deal process continues to build upon our existing practices to better capture and understand the engagement of our portfolio companies with issues associated with modern slavery and the requirements of the Modern Slavery Act. In the financial year ending 31 March 2023, we engaged with the management teams of 40 portfolio companies

Molten

through our ESG Framework, as part of the due diligence process. This Framework consists of 48 ESG-focused questions and covers a number of modern slavery topics including fair and equal pay, health and safety, diversity and inclusion and staff wellbeing. On completion of the Framework we are able to identify any risk areas, which if deemed significant enough, will be escalated to General Counsel for further consideration.

The full text of our ESG Policy can be found at <https://investors.moltenventures.com/sustainability> and sets out our approach to the various stages of the process from pre-investment through to exit.

9. Training & Reporting

To ensure appropriate understanding of the risks of modern slavery and human trafficking in our supply chains and within our business, Molten is committed to the ongoing education of our employees, officers, and other individuals who work for us about modern slavery; the Modern Slavery Act 2015 and the means of recognising, preventing and reporting suspected instances of modern slavery. During the period, mandatory compliance training was conducted for all employees (including the Executive Directors), on topics including: anti-bribery and corruption, anti-money laundering, data protection and cyber security, Senior Managers and Certification Regime and anti-modern slavery.

10. Further Steps

The Molten Group is committed to maintaining high ethical standards, protecting human rights, and acting with honesty and integrity in everything we do. As described above, we endeavour to understand where there are risks of modern slavery within any part of our business; our supply chain and our portfolio so that we can address them appropriately and sustainably.

We will continue to monitor and improve our practices and supply chains to develop and strengthen our commitment to human rights matters including the elimination of modern slavery and human trafficking.

Due to the relatively low level of modern slavery risk that we have assessed as being applicable to our business model (including our supply chain), we do not currently adopt key performance indicators (KPIs) in our business in connection with the matters set out in this Statement. However, for the financial year ending 31 March 2023, the Group has developed and published a Group Human Rights Policy which is cognisant of the potential for modern slavery and human trafficking in our business. The Molten Group has also targeted implementation of a similar policy at directly held portfolio companies by introducing a question to the ESG Framework around initiatives, policies or procedures in place around Human Rights.

This Statement is made by Molten Ventures plc for and on behalf of its broader group for the financial year ending 31 March 2023 in accordance with section 54(1) of the Modern Slavery Act 2015 and will be reviewed and published on an annual basis.

This Statement was approved by the Board of Directors of Molten Ventures plc, for and on behalf of the Molten Group, on 7 June 2023.



Martin Davis

CEO, Molten Ventures plc