



Anti-Bribery / Anti-Corruption policy

Version: 2.0

Language: ENGLISH

NYRSTAR GROUP POLICY



Context and scope

Nyrstar's reputation is built upon openness and honesty, which means acting ethically and with integrity in conducting our business. This anti-bribery/anti-corruption policy constitutes an integral part of Nyrstar's Code of Business Conduct and applies to all Nyrstar employees and anyone else performing services for Nyrstar. Failure to follow this policy may result in disciplinary action and personal liability.

Under no circumstances shall we give, or accept, bribes or other corrupt benefits to, or from, any person, be they government officials, business partners, customers or suppliers. Companies found to have breached anti-bribery rules face substantial fines, and individuals involved in such activity may face significant periods of imprisonment. Moreover, corrupt behavior or even the perception thereof, can seriously harm Nyrstar's reputation.

Bribery is the direct or indirect offering, promising, giving, receiving or soliciting "*anything of value*", in order to influence how someone carries out a public, commercial or legal duty. **Corruption** means a dishonest or fraudulent conduct by a government official. Bribery and corruption can both be perceived as the violation of trust or responsibility a person is given for personal gain. "**Anything of value**" constitutes any type of benefit to the recipient, such as cash (or cash equivalents, like vouchers), gifts and non-business related travel, entertainment and leisure. It also covers intangible benefits, for example, hiring someone's relative, or donating to a charity with an improper intent.

It is important that employees note that Nyrstar does not authorize employees or representatives to even make small 'facilitation' or 'grease' payments, such as unofficial payments made to secure or speed up routine, non-discretionary, legal government actions, such as issuing permits, visas or releasing goods held in customs.

Business partners

Nyrstar only intends to work with business partners who share similar ethical principles. Under anti-corruption laws, Nyrstar could be held responsible for the conduct of its business partners. Therefore, we carry out pre-onboarding screening on our business partners and our agreements contain terminations rights in case of non-compliance.

Gifts and entertainment

Business entertainment may still be offered and received in the appropriate circumstance. However, this practice has to be managed carefully to ensure that it does not amount to, or could be perceived as, a bribe. As a general rule, gifts and hospitality should always be given or accepted in good faith. True and genuine offers of gifts and hospitality should be given openly and transparently without any expectation of reciprocity and should not be linked to past or future personal gain.

Gifts or entertainment, given on behalf of Nyrstar should never exceed the (retail) value of **EUR/USD 100,00 (AUS 150,00)** per person. For gifts or entertainment received that exceed this threshold, explicit written approval needs to be obtained from the Nyrstar Compliance department. At Nyrstar we prefer to only give small, inexpensive corporate branded gifts, such as pens, bags and umbrellas preferably with the company's brand. Giving these types of gifts is permitted without written approval. We only host and organize reasonable entertainment that cannot be considered lavish or inappropriate.

Any gift or hospitality must be infrequent, reasonable, proportionate and appropriate in the circumstances, and there must be no possibility of them being misunderstood as improperly influencing the recipient.

Because a policy can never cover every individual situation, good judgment and common sense needs to be applied at all times and if any doubt exists, ask the Nyrstar Compliance department for clarity.

For questions or approvals, please contact the Nyrstar Compliance Department

tonnis.poppema@nyrstar.com or compliance.officer@nyrstar.com

Version history				
Author/reviewer	Position	Version	Date Approved	
T. Poppema	Head of Compliance	1.0	1-12-2020	
T. Poppema	Head of COmpliance	2.0	1-3-2021	