



## Human Rights Policy

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### NYRSTAR GROUP POLICY



## Contents

1.	Policy Statement.....	3
2.	Scope .....	3
3.	General Principles and Commitment .....	3
3.1.	Banning of Child Labor .....	3
3.2.	Preventing any forms of Modern Slavery .....	3
3.3.	Freedom of Association and Collective Bargaining .....	4
3.4.	Equal Opportunities and Non-Discrimination .....	4
3.5.	Fair Wages & Working Conditions .....	4
3.6.	Violence and Harassment in the Workplace .....	4
3.7.	Health and Safety at Work.....	4
4.	Human Rights Due Diligence Process .....	4
4.1.	Identifying and Assessing Risks .....	4
4.2.	Business Partner Code of Conduct.....	5
4.3.	Reporting Channels.....	5
4.4.	Investigation Procedures .....	6
5.	Training & Awareness.....	6
6.	Compliance Monitoring and Review.....	6
7.	Enforcement .....	6
8.	Contact Information .....	6

## 1. Policy Statement

At Nyrstar, we consider respect for human rights a fundamental component of responsible corporate governance.

Nyrstar is committed to ensuring that human rights are respected across our global operations and supply chains, particularly concerning modern slavery, forced labor, and human trafficking. This policy aligns with the United Nations Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO) Conventions.

The Nyrstar Code of Business Conduct sets out the company's objectives and expectations of how we work, the standards that we have put in place for contracting with business partners in our supply chain and the values that we use as base line for operating globally.

As a company, Nyrstar is committed to advancing respect for human rights. Nyrstar supports international efforts against modern slavery, forced labour and human trafficking in conformance with Nyrstar's Code of Business Conduct, and local and global applicable laws and regulations. Nyrstar continuously takes measures to ensure that no slavery, forced labour, child labour or human trafficking is present in its worldwide operations and supply chains.

This Human Rights Policy articulates the fundamental elements of Nyrstar's approach, and how we fulfil our commitment to respect human rights. The policy establishes a framework for identifying, preventing and addressing human rights impact associated with our business activities. The Nyrstar Board of Directors, through its ESG Committee, oversees our human rights activities which are embedded across the business.

## 2. Scope

This policy applies to:

- All employees (full-time, part-time, and contractors) working directly or indirectly for Nyrstar.
- All Nyrstar's business partners.

Nyrstar regularly deploys and communicates internal policies and public statements to ensure that everyone is conducting business in an ethical and transparent manner.

## 3. General Principles and Commitment

### 3.1. Banning of Child Labor

At Nyrstar, we strictly oppose to any form of child labour. We undertake not to employ children in violation of ILO conventions 138 and 182. Nyrstar applies the age of 18 as the minimum age for employment, except in the framework of internship- or vocational training programs, organized in co-operation with schools and training institutes or approved by the competent authority.

### 3.2. Preventing any forms of Modern Slavery

In accordance with ILO conventions 29 and 105, at Nyrstar we are opposed to any forms of modern slavery including forced labour, slavery, servitude and human trafficking.

Nyrstar is committed to the international efforts aiming to abolish modern slavery, forced labour and human trafficking, has a zero-tolerance approach to such activities and adheres to the definitions as set out by the ILO.

Any evidence of such labor practices in our supply chain will lead to the immediate termination of business relations with the concerned business partner.

### 3.3. Freedom of Association and Collective Bargaining

In accordance with ILO conventions 87 and 98, at Nyrstar we respect the freedom of employees to establish or to associate with any employee organization of their own choosing (including labour unions) without Nyrstar's prior authorization.

We subscribe to the principles of ILO convention 135 and recognizes the right of our employees to be represented by workers' unions and other employee organizations to collectively bargain on employment conditions.

### 3.4. Equal Opportunities and Non-Discrimination

In accordance with ILO convention 100 and 111, at Nyrstar, we make all efforts to foster an inclusive work culture. We appreciate and recognize that all people are unique and valuable and should be respected for their individual abilities.

We do not accept any form of harassment, discrimination, or unjustified unequal treatment, including on the basis of gender, religion, race, gender identity, national extraction or social origin, cultural background, social group, physical and/or mental disability, sexual orientation, marital status, age, political opinion, or other forms of discrimination covered by union regulation and national law. We promote an inclusive attitude when it comes to the diversity of our employees and actively work to identify and counter any barriers that may affect vulnerable groups within our workforce.

### 3.5. Fair Wages & Working Conditions

At Nyrstar, we apply national regulations and international standards on working hours, including ILO conventions 1 and 14. Employees shall receive sufficient work breaks throughout the day to ensure healthy and safe working conditions. Working hours should not exceed legal limits or international standards, whichever is stricter.

In line with ILO convention 95, remuneration and all the other benefits are based on the principle of fairness and comply with the individual minimum national legal standards or the company collective labour agreements, whichever is applicable. Wages paid to employees must meet or exceed living wage standards, as defined by local legislation or international guidelines (e.g., ILO's Decent Work Agenda).

### 3.6. Violence and Harassment in the Workplace

In line with ILO convention 190, we do not tolerate violence, harassment, abuse or mobbing of any kind, independent of the worker's contractual status. We create and maintain an environment free of violence or harassment and take measures to prevent and, in case of evidence, eliminate violence and harassment at work.

### 3.7. Health and Safety at Work

In line with ILO convention 155, we do not compromise on a safe and healthy working environment. Compliance with industrial health and safety regulations and high technical and operational safety standards are the basis for our work. Nyrstar strives to improve its health and safety performance continuously, with the aim to achieve a zero-harm workplace.

## 4. Human Rights Due Diligence Process

### 4.1. Identifying and Assessing Risks

Nyrstar utilizes the following procedures to identify and assess risks related to human rights violations in our supply chains:

- **Business Partner Screening:** All (new) business partners frequently undergo due diligence using a questionnaire assessing any Compliance risks associated, including any adverse media related to labour practices, respect for human rights, and compliance with the applicable regulations. Dependent on the product delivered to Nyrstar, additional due diligence actions may apply.
- **Country Risk Assessments:** High-risk regions, particularly those with weak labour protections or known forced labour practices, undergo additional country-specific risk assessments. Detailed guidance is set out in the Nyrstar Responsible Sourcing Policy.
- **Third-Party Audits:** Third-party auditors are engaged to conduct unannounced inspections at key suppliers, particularly in high-risk regions, as per ILO guidelines for monitoring working conditions and compliance. Detailed guidance is set out in the Nyrstar Responsible Sourcing Policy.

#### 4.2. Business Partner Code of Conduct

The expectations towards our business partners are set out in Nyrstar's Business Partner Code of Conduct, which explicitly addresses:

- Prohibition of forced and child labor and any forms of modern slavery including forced labour, slavery, servitude and human trafficking;
- Adherence to freedom of association and non-discrimination;
- Compliance with health and safety regulations;
- Commitment to environmental sustainability in accordance with International best practices (e.g., UN Sustainable Development Goals).

Any evidence of a business partner's non-compliance of the Nyrstar Business Partner Code of Conduct will be investigated and can lead to discontinuing the relationship with the concerned business partner.

#### 4.3. Reporting Channels

At Nyrstar, we are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and require them to report any concerns regarding breaches of the Code of Business Conduct, our policies or the law, whether these relate to Nyrstar or others. Nyrstar provides the following channels for reporting concerns related to human rights, among other, policies violations:

1. Concerns can be raised to the manager or supervisor of the employee or contractor
2. Direct contact with Nyrstar Compliance at: ([compliance.officer@nyrstar.com](mailto:compliance.officer@nyrstar.com)).
3. The Speak Up Helpline which is a (Navex) platform that is available to employees, business partners and third parties for reporting concerns. The Speak Up Helpline is available on the Nyrstar webpage and can be used for confidential reporting of violations, ensuring anonymity for whistleblowers. The helpline is managed by an external partner of Nyrstar, and can be reached 24/7 by phone and internet ([www.nyrstar.ethicspoint.com](http://www.nyrstar.ethicspoint.com)). These complaints or expressions of concern can be made anonymously and are directed to Nyrstar's Compliance department for investigation.

Speaking Up Helpline: [EthicsPoint - Nyrstar](#)

Phone numbers: [Speak up helpline | Nyrstar](#)

All complaints raised via either of these grievance channels are registered and followed up on by the company.

#### 4.4. Investigation Procedures

All complaints and expressions of concern received are investigated as set out below:

- Initial Investigation: Nyrstar Compliance conducts an initial investigation within a short period of receiving the complaint.
- Corrective Action: If a violation is confirmed, a Corrective Action Plan (CAP) is developed, specifying the necessary steps to address the issue.
- Third-Party Support: In complex cases, we engage independent third parties, such as Labour Inspection or relevant NGOs or labor rights organizations, to ensure impartiality and thorough investigation.
- Detailed guidance is set out in the Nyrstar Investigation Procedure.

#### 5. Training & Awareness

To support this policy, employees will receive mandatory training and awareness materials on human rights, forced labor prevention, and compliance with the regulations and standards concerning modern slavery and forced labour.

#### 6. Compliance Monitoring and Review

This policy will be monitored on an ongoing basis, and compliance with the policy will be reviewed annually. Any updates to relevant laws and regulations will be reflected in revisions to this policy.

#### 7. Enforcement

Breaches of this policy could result in disciplinary action up to and including termination of employment or contractual relationship with Nyrstar.

#### 8. Contact Information

For questions or more information regarding this policy, please contact:

Nyrstar Compliance at: ([compliance.officer@nyrstar.com](mailto:compliance.officer@nyrstar.com)) or Nyrstar SHEQ team.

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## Appendix A : Definitions

- **Human rights:** as identified by the United Nations are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.
- **Forced labour:** according to ILO refers to all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. It can also be defined as "any work or services which people are forced to do against their will under threat of punishment" .
- **Modern slavery:** can be defined as 'the severe exploitation of other people for personal or commercial gain'.
- **Human trafficking:** is generally understood to refer to the process through which individuals are placed or maintained in an exploitative situation for economic gain. Trafficking can occur within a country or may involve movement across borders. Women, men and children are trafficked for a range of purposes, including forced and exploitative labour in factories, farms and private households, sexual exploitation, and forced marriage. Trafficking affects all regions and most countries of the world.