



Speak-Up policy and Investigation protocol

Version: 1.0

Language: ENGLISH

NYRSTAR GROUP POLICY



Context and scope

At Nyrstar we believe that upholding our corporate values is extremely important. *Integrity* and *Respect* are two of the five core values that underpin how we work, and how we treat each other at Nyrstar. These values imply that we listen and treat each other fairly. We recognize that from time to time there may be things that go wrong, or where there is room for improvement. Therefore, we encourage our employees to speak up when they believe there is something wrong.

This policy aims to clarify when, and how, Nyrstar employees can report a particular issue that concerns them. It also describes how the company deals with a particular report or concern, in order to make sure the reporter feels safe and the issue is dealt with in a fair, consistent and timely matter.

Concerns covered by the Speak-Up policy

This Speak-Up policy can be used to raise concerns about suspected misconduct, violation of the law, violation of our Code of Business Conduct and/or company policies. Examples of such concerns are fraud, discrimination, inadequate recordkeeping, conflicts of interest, safety concerns, disclosure of confidential information and other practices that contravene Nyrstar's policies and corporate values.

Do not use this policy for any grievances you may have in relation to your terms of employment or to settle personal disputes. Also, do not use this policy to make accusations which you know are false. Doing so may lead to disciplinary measures.

Nyrstar reporting procedure

If you see, experience or suspect illegal, or unethical, behavior, there are various escalation channels available.

(i) Talk to your manager/supervisor

First and foremost, in case of concerns on the work floor, you are encouraged to address them directly with the individual(s) involved. If this would not be appropriate, or if you feel that this might lead to escalated tension, it is crucial that the issue is being discussed with the employee's supervisor or line manager. You might also decide to discuss the matter with your local HR representative who can mediate on your behalf.

(ii) Contact Nyrstar's compliance officer

In case an employee suspects misconduct, and genuinely believes that the matter cannot be dealt with through the available channels mentioned above (for instance if the supervisor, line manager or HR representative is subject in the matter), the issue can be reported to Nyrstar's Compliance officer at compliance.officer@nyrstar.com.

(iii) Use the Speak-Up Helpline

If the matter cannot be reported to a supervisor/line manager, or to Nyrstar's compliance officer, or if the matter has not been satisfactorily dealt with by them, you can report your concern through the dedicated external helpline. This mechanism allows you to raise concerns confidentially and anonymously. The helpline is managed by an external partner of Nyrstar, and can be reached 24/7 by phone and internet (www.nyrstar.ethicspoint.com).

Reporting can be done in the local language of the employee, in total confidence and anonymous, if preferred. Toll free phone numbers per country can be found at the end of this policy and on Nyrstar's Intranet. The Nyrstar Compliance department (including, but not limited to, the Global Head of Compliance, or his/her replacement in case of temporary absence) is responsible for investigating the matter and has access to the Speak-Up report database.

After a report is completed, the individual will receive a unique code, which he/she can use to call back, or access the website, to check the progress status of the report and/or to communicate with the investigator of the case (in most cases this is a representative of the Nyrstar Compliance Department). Through the use of the unique code, the reporter can remain anonymous, if he/she prefers so, while still being able to communicate.

Nyrstar will not tolerate employees who are knowingly making false claims about misconduct. Individuals reporting a (suspected) violation of misconduct 'in good faith', with sufficient information to back up their claims, will receive reasonably rapid feedback. An employee is considered to be reporting 'in good faith', when they provide information which they assume is comprehensive, accurate and fair. The employee should reasonably believe in the truthfulness of the information given, even if he/she later turns out to be mistaken and the issue has no merit.

Investigation

Once a matter has been reported, Nyrstar's compliance department will be responsible for following up, researching the validity of the matter and for the closure of the issue. In case the matter has been reported through the Speak-Up helpline, the reporting individual will receive a receipt confirmation immediately. In case the report has been filed with the compliance department, this will happen within one week after the report has been filed.

Duration of the investigation and closure of the issue will depend on the complexity of the matter, but the Nyrstar compliance department commits that it will be urgently dealing with all matters that have been reported, regardless of their content, as long as they fall within the scope mentioned under "*Concerns covered by the Speak-Up policy*".

Non-retaliation

Employees need to feel confident that they will not suffer for raising concerns in good faith about suspected misconduct. Nyrstar does therefore not tolerate retaliation, or employees seeking revenge against another employee who has reported an issue, concern or complaint. Examples of retaliation include demotions, inappropriate performance ratings, termination of employment, harassment and threats. Anyone who engages in retaliatory conduct will be subject to disciplinary action, including immediate termination of employment.

Data protection, Confidentiality and Data Retention

Nyrstar is committed to protecting the privacy of everyone involved. It will do everything reasonable to protect personal data from unauthorized access and processing. The individuals handling speak up reports are strictly bound by rules of confidentiality. All reported issues will be treated confidentially regardless of position or seniority.

The information that has been submitted by the reporter will only be shared with a limited number of people and on a strict need-to-know basis. The reporter and the person implicated by the report (if any) are also bound by the same rules of confidentiality.

In principle, Nyrstar will inform the implicated person against who a report has been filed about the matter. However, the identity of the employee reporting the issue will not be disclosed. Information about the matter will be kept confidential and will only be disclosed to others if required by law, or when there is an immediate threat to general health and safety.

Please refer to Nyrstar's 'Privacy Policy' for more details about the processing of personal data.

Contact details Nyrstar Compliance Officer:

Tonnis Poppema, Global Head of Compliance, compliance.officer@nyrstar.com, +31.6. 3030 1205

Speak-Up helpline telephone numbers:

Country:	Telephone number:
Australia	1800 451 595
Belgium	0800 71 804
France	0 805 08 05 72
Netherlands	0800 0229341
United States	(855) 625-0615

<i>Version history</i>				
Author/reviewer	Position	Version	Date Approved	
T. Poppema	Head of Compliance	1.0	1-12-2020	