



Responsible Sourcing Policy

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NYRSTAR GROUP POLICY



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1. Introduction

At Nyrstar, we produce significant quantities of essential resources, such as zinc and lead. As an international metals and mining company, we believe it is crucial to conduct our operations competitively and with high skills, but also through responsible conduct and a sustainable supply chain. This means we carry out our business according to high ethical standards and in compliance with applicable laws and regulations.

Nyrstar owns mines, smelters and other operations in Europe, the United States and Australia. Nyrstar purchases, processes and trades metals and minerals for use in multiple products and technologies. Its suppliers are predominantly traders, mining companies, aggregators and logistic service providers. Nyrstar recognises that the extraction, handling, processing, transportation and trade of metals and minerals have the potential to contribute to, benefit from, or result in significant adverse impacts. As part of our commitments to conducting business ethically and in compliance with all applicable laws and requirements prescribed by industry-wide organisations to which we are a stakeholder, we are committed to source metals and minerals responsibly. Our responsible sourcing commitment has led us to establish and implement a five-step due diligence process as defined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (www.oecd.org).

2. Scope

This Policy applies to all concentrates and minerals handled by Nyrstar and it reflects requirements related to the OECD Guidance and the Joint Due Diligence Standard Copper, Lead, Nickel, and Zinc. We encourage our suppliers to align with our “Code of Business Conduct”. We believe that all commercial counterparts across our value chain should adopt, and implement comparable standards. At a minimum, our suppliers should comply with international and host country laws and regulations, as applicable. Prior to engagement, potential suppliers may be asked to complete a ‘Know Your Counterparty Questionnaire’ (KYC), which helps Nyrstar in fulfilling its third party due diligence requirements. During the course of the relationship, Nyrstar will regularly screen its suppliers on certain risks .

3. Our commitment

We are committed to identifying, assessing and responding to potential and actual adverse environmental, social and governance related impacts in our supply chains, as outlined in OECD Guidance (www.oecd.org), that are directly linked to our operations, products, or services, even if we have not contributed to those impacts. If a supplier fails to align with this Policy, or comply with international and host country laws and regulations, as applicable, we will take remedial action and may choose to suspend or discontinue the affected supply.

➤ **Regarding serious abuses associated with the extraction, handling, processing, transportation and trade of metals and minerals:**

We will not tolerate nor by any means profit from, contribute to, assist with or facilitate the commission of serious abuses by any party of:

- I. torture, cruel, inhuman and degrading treatment;
- II. forced or compulsory labour;
- III. the worst forms of child labour;
- IV. other human rights violations and abuses;
- V. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

We will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined above.

➤ **Regarding support to non-state armed groups:**

We will not tolerate any direct or indirect support to non-state armed groups, as defined in the OECD Guidance, through the extraction, transport, trade, handling or export of metals or minerals. We will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined above.

➤ **Regarding public or private security forces:**

We will eliminate (in)direct support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders. We will proceed to suspend or discontinue engagement with suppliers where we identify a reasonable risk that the supply chain directly or indirectly supports public or private security forces acting as described above.

➤ **Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport, and export. We will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party associated with bribery and fraudulent misrepresentation of the origin of minerals as described above.

➤ **Regarding money laundering:**

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport, or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by suppliers. We will immediately suspend or discontinue engagement with

suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party associated with money laundering as described above.

➤ **Regarding the payment of taxes, fees, and royalties due to governments:**

We will ensure that all taxes, fees, and royalties related to mineral extraction and trade are paid to governments and we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (“EITI”). We commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

4. Implementation

➤ **Due diligence management systems**

Nyrstar undertakes risk-based due diligence in line with the OECD Guidance focusing on those activities in the supply chain where risks to people and the environment are greatest. We will assess our own activities and the activities of our suppliers against the standards set out in this Policy. Nyrstar has a management system in place to identify and mitigate risks in the supply chain. Due diligence activities are overseen by the Responsible Sourcing Team with support from Trafigura Corporate Affairs team and relevant Nyrstar departments (including but not limited to Corporate Affairs, Business Execution, Sales, Procurement, Internal controls and Legal) and reporting directly to Nyrstar’s Chief Executive Officer. Findings of supply chain due diligences are reported to senior management. The outcomes of these processes may lead to risk mitigation plans. For more information around our management system, we refer to our Responsible Sourcing Management System.

➤ **Employee training**

Nyrstar provides training to relevant employees to ensure that this Policy is communicated, understood and applied within the company.

➤ **Supplier Engagement**

We will communicate this Policy, our Policy Statement and Nyrstar’s Code of Business Conduct to all suppliers. We will seek to build and/or exercise leverage over the actors in the supply chain who can most effectively and most directly prevent and mitigate the risks of adverse impacts. Where risks of adverse impacts and/or actual adverse impacts are identified, Nyrstar will seek to engage suppliers on the design and implementation of measurable improvement plans, involving external stakeholders such as government or civil society as appropriate. Nyrstar encourages its suppliers to engage with their own suppliers to disseminate and adopt equally stringent responsible sourcing standards across the supply chain.

➤ **Review and Report**

Nyrstar will regularly review its due diligence practices and guidance to ensure that they remain accurate and responsive to the assessment of evolving supply chain risks. As recommended by the OECD Guidance, we will publicly report on our supply chain due diligence. Nyrstar has deployed its

Speak-Up helpline, which is accessible 24/7 in any language by phone (for local phone numbers, please refer to the Code of Business Conduct) and internet by visiting www.nyrstar.ethicspoint.com. For further information on Nyrstar's responsibility commitments and efforts, please visit <https://www.nyrstar.com/responsibility>.

5. How to report (suspected) misconduct?

If you become aware of any acts that violate this policy, you are expected to report this to your (direct) manager or contact the Speak-Up helpline.

5.1 Speak-Up Helpline

The key to our culture of ethical conduct is honest, transparent communication. If you have any questions or become aware of, or suspect that, a breach of this policy, has occurred or may occur in the future, you must report your concerns to your manager or to the compliance officer (compliance.officer@nyrstar.com)

Where a concern remains unresolved through the above local channels, or should you, for whatever reason and at any time, feel uncomfortable utilising the local channels for resolution of your concern, you can also raise it, also anonymous, via the 'Speaking-Up Helpline'. The helpline is managed by an external partner of Nyrstar, and can be reached 24/7 by phone and internet (www.nyrstar.ethicspoint.com).

We refer to our **Speaking Up Policy** for more information.