



# Business Partner Code of Conduct

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## NYRSTAR GROUP



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## 1. INTRODUCTION BY OUR CHIEF EXECUTIVE OFFICER

At Nyrstar, we produce critical minerals and metals essential for a low carbon future. With a market leading position in zinc and lead, Nyrstar has mining, smelting and other operations located in Europe, the United States and Australia and employs approximately 4,000 people. As an international metals and mining company, we prioritize conducting our operations with competitive excellence and high proficiency, while also ensuring responsible practices and a sustainable supply chain. This commitment involves adhering to stringent ethical standards and complying with all relevant laws and regulations.

Our Business Partner Code of Conduct ("the Code") serves as the cornerstone for outlining our principles and the ethical business practices expected from our suppliers, contractors, consultants, and other business partners. It delineates how we operate legally, ethically, and competitively, and how we interact with one another. We recognize our social responsibilities and our obligations to our employees, business partners, and the communities in which we operate. The Code is thus a crucial instrument for safeguarding the future reputation and success of Nyrstar and our partners. Therefore, the implementation of these principles is a strategic priority.

Thank you for your dedication to upholding our Business Partner Code of Conduct.

**Guido Janssen**

**Chief Executive Officer**

## 2. Nyrstar Business Partner Code of Conduct International Standards

The Nyrstar Business Partner Code of Conduct is founded on prominent international reference documents and standards, including:

- The United Nations Global Compact
- The United Nations Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- The International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD Due Diligence Guidance for Responsible Business Conduct

Adherence to this Business Partner Code of Conduct is a fundamental requirement in all contracts between Nyrstar and its business partners. Should any business partner fail to comply with any aspect of the Code, they will be required to take immediate corrective actions. Nyrstar reserves the right to refrain from initiating or to terminate contracts with any business partner who cannot demonstrate their compliance with this Business Partner Code of Conduct.

## 3. SOCIAL STANDARDS

### 3.1. Respect for Human Rights

We expect our business partners to uphold and support the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization (ILO) Conventions. Business partners must ensure they are not involved in any human rights abuses. Where national legislation exists, the rules that provide greater protection to employees should be applied.

### 3.2. No child, forced, illegal or compulsory labour

In alignment with the conventions of the International Labour Organization (ILO), our business partners must not engage in or condone child labour, forced labour, illegal labour, or any other form of compulsory labour.

### 3.3. Transparency of working hours and remuneration

Our business partners must ensure that working hours comply with applicable national laws. Employees should receive employment contracts that clearly state their working hours and compensation, in accordance with local regulations. Additionally, all remuneration must be paid promptly and in compliance with current national laws.

### 3.4. No discrimination or harassment

Our business partners must treat all employees with respect and dignity. No employee should be subjected to physical, psychological, sexual, or verbal harassment or abuse for any reason. The prohibition of discrimination extends to all aspects of employment, including recruitment, compensation, promotion, and termination.

### 3.5. Freedom of association and the right to collective bargaining

Our business partners must respect their employees' freedom of association and right to collective bargaining as outlined in current applicable laws and ILO conventions.

### **3.6. Respect for local communities and indigenous people**

Our business partners have a duty to minimize any negative physical, social, and environmental impacts and risks on local communities and indigenous people. They must recognize the unique circumstances of indigenous people and understand the concerns and expectations of the communities in which they operate.

### **3.7. Occupational Health & Safety**

In compliance with applicable laws and regulations, our business partners must ensure the occupational safety and health of their employees. All hazards and the resulting health risks encountered by employees must be properly assessed, and necessary safeguard measures must be implemented. Additionally, they must provide ongoing training to their employees on occupational safety regulations.

## **4. ENVIRONMENTAL STANDARDS**

### **4.1. Compliance with Environmental Laws and Regulations**

We expect our business partners to adhere to all applicable local, national, and international environmental laws and regulations.

### **4.2. Sustainable Resource Use and Waste Management**

This includes the efficient use of resources such as water, energy, and raw materials, with a preference for renewable resources wherever feasible. Additionally, it involves proper disposal of waste and effluents, reduction of waste generation, and promotion of recycling and reuse.

### **4.3. Protection of the environment**

We expect our business partners to conduct their business activities in compliance with all applicable laws and regulations regarding environmental protection. They should establish and maintain processes and procedures to minimize environmental impact and risks, and continuously improve environmental performance. This encompasses resource efficiency, including water use; emissions to air, soil, and water; waste reduction and disposal; and noise protection.

### **4.4. Energy Efficiency and Climate Change**

Nyrstar and its business partners are committed to initiatives that reduce energy consumption and greenhouse gas emissions, and incorporate renewable energy sources into operations where possible.

### **4.5. Minimization of resource deployment**

Our business partners must consistently strive to use resources mindfully and responsibly, integrating this approach within their supply chain and business operations and management.

## 5. GOVERNANCE STANDARDS

### 5.1. Antitrust compliance and commitment to free competition

Our business partners must observe and comply with all applicable national and international antitrust laws. We expect them to be committed to free competition, transparent markets, and to act against unfair, non-transparent, and restricted competition. Appropriate and necessary preventative measures must be taken to ensure this.

### 5.2. Anti-corruption

Our business partners must act against corruption and bribery, which includes taking all necessary and appropriate measures to prevent corruption and bribery within their operational business as well as within their respective supply chain. Our business partners should ensure that personal relationships do not interfere with business activities.

### 5.3. Anti-Money Laundering

Our business partners must refrain from any form of money laundering activities. This also needs to be ensured by them within their supply chain.

### 5.4. Confidential and Proprietary Information

Our business partners should protect confidential and any other proprietary information obtained in the course of the business relationship with us. They should observe applicable data privacy and information security requirements when handling information.

### 5.5. Sanction screening and export controls

Many jurisdictions have trade compliance laws that restrict the import and export from, to, or through sanctioned countries. These laws also prohibit transactions with sanctioned criminal organizations and individuals. Trade compliance is extremely complex and subject to constant change, depending on economic and political circumstances. Therefore, Nyrstar carries out careful due diligence on business partners before engaging in any business relationship.

### 5.6. Reporting violations, speaking up and guarantee of non-retaliation.

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 mean 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.

Nyrstar is committed to encouraging the prompt and transparent escalation of issues and concerns from all internal and external stakeholders. To facilitate this objective, Nyrstar established a Speak-Up hotline. The Speak-Up hotline is provided and administered by a specialist third-party supplier to ensure a transparent and (if desired) anonymous process. It can be reached 24/7 in any language by phone and internet ([www.nyrstar.ethicspoint.com](http://www.nyrstar.ethicspoint.com)).

## 6. Business Testimonials

Nyrstar does not automatically give permission to business partners to use Nyrstar name and/or trademark and its employees' references or testimonials to endorse products, services, business acumen. Nyrstar is however supportive of promoting a mutual reputational benefit as a result of partnerships with its business partners, if found appropriate and vetted by both parties.

## 7. Contact Information

For questions or more information regarding this policy, please contact Nyrstar Compliance at: ([compliance.officer@nyrstar.com](mailto:compliance.officer@nyrstar.com)).



