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Policy commitment for minerals originating from conflict - affected and high risk areas

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This policy provides a framework for due diligence as a basis for responsible supply chain management of 3TG from conflicted and high risk areas.

Although Nimet does not directly purchase raw 3TG minerals from suppliers, we impose strict standards for product procurement.

The purpose of this policy is to respect human rights and avoid contributing to conflict through purchase decisions, including the choice of suppliers.

Due diligence is an on-going, proactive and reactive process.

Conflict-affected and high risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc.

High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence, widespread human rights abuses and violations of national or international law.

While sourcing from conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

1. Regarding serious abuses associated with the extraction, transport or trade of minerals:

- a. any forms of torture, cruel, inhuman and degrading treatment;
- b. any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- c. the worst forms of child labour;
- d. other gross human rights violations and abuses such as widespread sexual violence;
- e. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

2. Regarding risk management of serious abuses:

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

3. Regarding direct or indirect support to non-state armed groups:

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals.

4. Regarding risk management of direct or indirect support to non-state armed groups:

We will immediately suspend or discontinue engagement with upstream 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.

5. Regarding public or private security forces:

We agree to eliminate, direct or indirect 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.

6. Regarding risk management of public or private security forces:

In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, where we identify that such a reasonable risk exists.

In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

7. 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.

8. 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 upstream suppliers.

9. Regarding the payment of taxes, fees and royalties due to governments:

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

10. Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money - laundering and payment of taxes, fees and royalties to governments:

In accordance with the specific position of the company in the supply chain, 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 measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

This policy is communicated internally and is available to all stakeholders through publication on the website www.nimet.ro.

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