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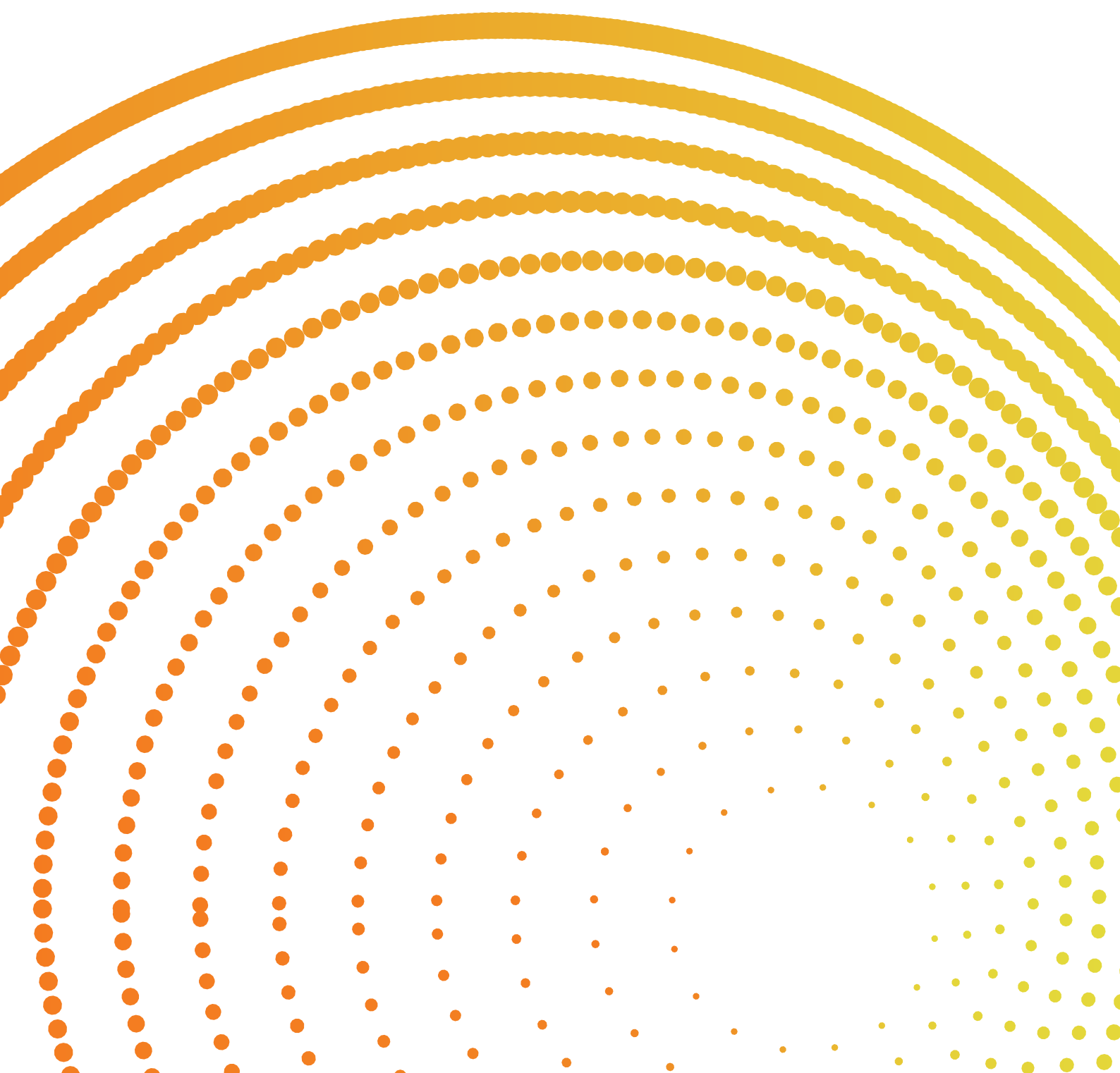
# Suppliers Code of Conduct Policy 2024

**MOLYCOP**

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Molycop Legal

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## Suppliers Code of Conduct Policy

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### Introduction

Molycop is committed to the highest ethical and legal standards in the way we conduct our business. Molycop expects and requires that all parties who are doing business with Molycop, act with integrity and acknowledge and agree to abide by the values, policies and principles set for in this **Molycop Suppliers Code of Conduct, therefore the Supplier undertakes to:**

- I. Legal Compliance:** Molycop is fully committed to integrity and excellence, and we require all our Suppliers to fully comply with applicable laws, regulations, and industry standards relevant to their operations and their interactions with us, therefore all our Suppliers agrees to comply with:
  - All applicable laws and regulations.
  - All Molycop policies posted on Molycop's website (www.molycop.com), as supplemented or amended from time to time (collectively, the "Policies").
- II. Responsible sourcing:** Molycop's Suppliers are expected to endeavor to source materials responsibly, therefore all our Suppliers should:
  - take reasonable efforts and measures to avoid in its products the use of raw materials which originate from Conflict-Affected and High-Risk Areas<sup>1</sup> or which contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.
- III. Prohibition of Corruption and Bribery:** As in Molycop we are fully committed to conducting business with integrity and in compliance with the highest ethical standards, we extend this commitment to our Suppliers, therefore our Supplier will not:
  - Tolerate any form of and not engage, directly or indirectly, in any form of corruption or bribery.
  - Grant, offer or promise anything of value to a government official or to a counterparty in the private sector to influence official action or obtain an improper advantage.
- IV. Anti-money laundering, terrorism financing:** Molycop has zero – tolerance for money laundering and terrorism financing, and we require our Suppliers to implement robust controls and conduct due diligences to detect and prevent any financial misconduct or the misuse of their services for illicit purposes, as Molycop as well as our Suppliers will not:
  - Directly or indirectly facilitate money laundering or terrorism financing.
- V. Fair competition, anti-trust laws and intellectual property rights:** Molycop is committed to ensure that market competition remains healthy and that business practices are both ethical and legal, therefore Molycop expects its Suppliers to engage and:
  - Act in accordance with all applicable competition laws and not participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.
  - Respect and protect the intellectual property rights of others.

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<sup>1</sup> Means such areas that are identified by the presence of armed conflict, widespread violence or other risks of harm to people, such as a conflict of international or non-international character, which 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 characterized by widespread human rights abuses and violations of national or international law.

**VI. Data Privacy and Cybersecurity:** In Molycop we are fully committed to protect personal data, ensuring confidentiality and integrity in handling data, ensuring that we all comply with the applicable privacy and data protections laws, so our Suppliers should:

- Process personal data confidentially and responsibly, respecting everyone's privacy and ensuring personal data is effectively protected and used only for legitimate purposes.

**VII. Conflict of Interest:** Molycop's Suppliers are expected to conduct their business with clear ethical standards, ensuring that their actions do not compromise their obligations to Molycop or lead to conflicts of interest. All our Suppliers should avoid all conflict of interest that may adversely influence our business relationship.

**VIII. Human rights and labor practices:** In Molycop we are dedicated to upholding internationally recognized human rights. Therefore Molycop's Suppliers are expected to commit to:

- Respect all internationally proclaimed human rights by avoiding causation of and complicity in any human rights violations.
- Pay heightened attention to ensure respect of human rights of specifically vulnerable rights holders or groups of rights holders such as women, children, migrant workers, and indigenous communities.
- Prohibition of Child and Forced Labor: Molycop and our Suppliers unequivocally prohibit any form of modern slavery within our supply chain, including forced, bonded or indentured labor, human trafficking, child labor, and any other type of involuntary servitude. All our Suppliers shall adhere to this principle rigorously and to conduct their operations without engaging in coercive or exploitative practices and to follow all applicable laws relating workers' wages and working hours.
- Non-Discrimination and Respect in Employment: Suppliers are expected to maintain the highest ethical standards in employment by actively promoting fairness and equality. This involves preventing discrimination based on attributes such as race, gender, nationality, or disability, and applies to all employment actions from hiring to daily interactions. Suppliers are also required to foster an inclusive workplace that respects each individual's dignity, privacy, and rights.
- Harassment – Free Workplace: Suppliers must uphold the highest ethical standards by ensuring a respectful and dignified work environment. It is imperative that all forms of insulting, harassing, or offensive conduct are strictly prohibited. This commitment extends to preventing verbal and physical behaviors that undermine individual respect, including, but not limited to, derogatory comments about racial, ethnic, gender, or religious characteristics, as well as any form of sexual harassment, abuse, mental cruelty, or coercion.

**IX. Health and Safety of Employees:** Suppliers are urged to uphold the highest ethical standards in environmental, health, and safety practices, transcending basic compliance to truly embrace Molycop's EHS policies. This commitment should manifest in proactive measures that prioritize the well-being of people and the preservation of the environment. Suppliers share a moral duty with Molycop to create and enact thorough emergency response strategies that protect lives, maintain environmental integrity, and secure property, reflecting a profound dedication to ethical and sustainable business operations. We believe that ethical responsibility extends into every aspect of business operations. Therefore, we encourage our suppliers to:

- Adhere rigorously to both statutory and international standards related to occupational health and safety, ensuring safe working environments.
- Identify hazards diligently and adopt the most effective precautionary measures to prevent accidents and mitigate occupational health risks.
- Commit to ongoing training programs that empower employees with the knowledge and skills necessary for maintaining their health and safety at work.
- Implement a robust occupational health and safety management program that reflects our shared values of sustainability and proactive care for all stakeholders.

- X. Environmental Protection:** Suppliers will engage in practices that protect the environment, minimize pollution, and establish and maintain effective environmental management systems by:
- Acting in accordance with the applicable statutory and standards regarding environmental protection.
  - Minimizing any environmental pollution and making continuous improvements in environmental protection.
  - Setting up and implementing a reasonable social, environmental, and governance management policy.
- XI. Supply Chain:** Our Supplier should use reasonable efforts to promote among its suppliers to comply with this Supplier Code of Conduct.
- XII. Grievance Mechanisms and Reporting:** Supplier will provide secure channels for employees to report violations of this code and protect whistleblowers from retaliation.



**Jim Anderson**

Chief Executive Officer  
October 2024



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