

# **Transamine Group Business Partners' Code of Conduct**

## **1. Responsible Mineral Supply Chain**

We are committed to continuous improvement and to complying with the environmental, social and governance international standards and requirements to manage sourcing, procurement, supplier relationships, ethical, environmental, and quality expectations for our supply chain.

Business Partners are expected to adhere to the principles of this Code of Conduct, maintain processes implementing the principles as outlined herein and to cooperate in granting transparency throughout their supply chain.

## **2. Business Integrity and Ethics**

Business Partners undertake to maintain the highest level of integrity and to comply with the laws and regulations against bribery, corruption, conflicts of interest, misrepresentation of the origin of materials and other unlawful business practices, such as money laundering.

## **3. Human Rights and Labour Rights**

### **3.1 Child Labour**

Business Partners must not engage in nor tolerate child labour, as stated in the ILO Convention no. 182.

### **3.2 Forced Labour**

Transamine does not tolerate illegal or inhuman labor practices and among these, inhuman and degrading treatment, forced and involuntary labour and discrimination. Business Partners must respect human dignity, protect human rights and remediate to any violations.

### **3.3 Non-discrimination**

We expect our business partners to treat all people with respect and dignity, by ensuring fair treatment and prohibiting harassment and discrimination.

## **4. Environment and Local Communities**

Transamine believes that we all have a responsibility to take care of and minimize adverse impact on the environment and communities. This shall be achieved through responsible corporate management.

Business Partners shall commit to protecting the environment and the communities living in the related areas by acting in accordance with national and internationally recognized standards.

They shall prevent negative impacts by implementing sustainable practices and promoting environment safeguards.

## **5. Health and Safety**

Business Partners are required to have procedures in place to ensure security and provide safe and healthy work environment conditions to their employees, in accordance with recognized international standards.

## **6. Responsible Sourcing of Minerals and Metals**

Suppliers sourcing minerals from conflict-affected or high-risk areas must comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

They will not tolerate nor contribute to any risks linked to human rights abuses.

## 7. Implementation

Business Partners shall act in accordance with the applicable laws of the countries in which they operate and comply with the fundamental frameworks of the industry, specifically:

The United Nations Guiding Principles on Business and Human Rights;  
The OECD Guidelines for Multinational Enterprises;  
The OECD Due Diligence Guidance for Responsible Business Conduct;  
The UN Universal Declaration of Human Rights;  
The ILO Conventions Nos 138 and 182  
The ILO-IOE Child Labour Guidance.

## 8. Grievance Mechanism

Business Partners shall establish and maintain grievance mechanisms for interested parties to raise reasonable concerns about the existence of a potential or actual adverse impact related to the above issues.

## 9. Transamine's Expectations

We expect that our business partners:

Comply with all applicable laws, regulations and industry standards;  
Demonstrate integrity, transparency, and accountability;  
Support fair competition and avoid conflicts of interest;  
Ensure safe, respectful, and inclusive working environments;  
Collaborate to resolve issues and improve sustainability;  
Protect confidential information.

## 10. Compliance

Should any breach of the principles set out in this code of conduct be observed, Transamine may request the business

partner to take appropriate action. Failure to comply may result in reviewing of the relationship, up to suspension of the commercial contract.

## 11. Transamine Complaints Mechanism

Suspected violations of this Code of Conduct must be reported to Transamine's management through our grievance mechanism, which is available on [www.transamine.com](http://www.transamine.com).

For more guidance, please contact Transamine Group Legal & Compliance Department:  
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