

Being aware of the risks and negative impact related with the extraction, trade, handling and export of minerals that comes from conflict and high-risk areas, and having the responsibility to respect human rights and not contribute to conflicts, we are committed to adopt, spread and add into contracts or agreements with suppliers the following policy on responsible sourcing of flows from conflict and high-risk areas, which represents a common reference for sourcing practices regarding of conflicts and risk awareness of suppliers from the point of extraction to the end user.

We undertake to avoid any action that contributes to the financing of conflicts and to fulfil with the relevant United Nations sanctions resolutions or, where appropriate, with the national legislation implementing such resolutions.

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

1. While sourcing from, or operating in, 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:
  - i) any forms of torture, cruel, inhuman and degrading treatment;
  - ii) 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;
  - iii) the worst forms of child labour;
  - iv) other gross human rights violations and abuses such as widespread sexual violence;
  - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

**Regarding serious abuses management**

2. We will immediately suspend or disrupt our commitments with upstream suppliers when we detect a reasonable risk that it is supplied, or is linked, to any third party that is committing serious abuses as defined in section 1.

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

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

**Regarding direct or indirect support to non-state armed groups management:**

4. We will immediately suspend or disrupt our commitments with upstream suppliers when we detect a reasonable risk that they are sourcing, or linked to, any third party that is supporting, directly or indirectly, non-state armed groups, as described. It defines them in section 3.

**Regarding public or private security forces:**

5. We agree to eliminate, in accordance with paragraph 10, 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. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade

7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups (in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining) to adverse impacts associated with the presence of security forces, public or private, on mine sites.

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

10. Depending on the specific position of the company in the supply chain, we will design, adopt and immediately implement a risk management plan with upstream suppliers and other stakeholders to prevent or reduce the risk of direct or indirect support to public or private security forces, as defined in section 5, as soon as we detect that there is a reasonable risk. In such cases, we will suspend or disrupt our commitments to upstream providers after several unsuccessful risk mitigation attempts within six months of the risk management plan being adopted. When we detect a reasonable risk that non compatible activities with sections 8 and 9 of the provisions are being carried out, we will respond similarly.

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

11. 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 of minerals.

**Regarding money laundering:**

12. 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.

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

13. 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).

**Regarding the management of bribery and fraudulent misrepresentation of the origin of minerals, money laundering and the payment of taxes, fees and royalties due to governments.**

14. In accordance with the position of the company in the supply chain, we commit to engage with suppliers, relevant authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain through quantitative measures. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation for any of these risks defined above.