

Supply chain policy - ALTICHEM

Recognising that the mining, trading, processing and export of metals from conflict or high-risk areas may involve the risk of serious negative impacts and that we have a responsibility to respect human rights and not contribute to conflict, we are committed to applying and incorporating the following Responsible Sourcing Policy for metals from conflict or high-risk areas into contracts and/or agreements with our suppliers for the metals we source. This policy provides a common benchmark for conflict-sensitive sourcing practices and supplier awareness of the risks of the metals we purchase from the point of extraction to the end user.

We undertake, to the extent known to us, to refrain from any action that could contribute to the financing of a conflict and to comply with applicable United Nations resolutions or, where applicable, national laws implementing such resolutions.

With our duty of care in mind, we only work with suppliers with whom we already have a long-standing business relationship for the procurement of tin and who are mandatory members of the International Tin Association (ITRI) and have thus already demonstrated their high standards. It was decided by the management not to include any new tin suppliers outside the EU in addition to the suppliers we have already approved. The internal master data approval process has been adapted to this. Should it become necessary to reconsider this risk restriction at some point in the future, a new risk analysis will of course be carried out.

In relation to serious injuries in the extraction, transport or trade of metals:

1. when sourcing in or operating in conflict or high risk areas, we will not tolerate, benefit from, contribute to, support or in any way facilitate the following actions by third parties:
 - any form of torture or cruel, inhuman and degrading treatment
 - any form of forced or compulsory labour, i.e. any work or service which is required of a person under threat of punishment and for which the person has not made himself or herself available voluntarily
 - worst forms of child labour
 - Other flagrant violations as well as human rights violations such as sexual violence
 - War crimes or other flagrant violations of international humanitarian law, crimes against humanity or genocide.

In relation to risk management of serious injuries:

2. we will immediately suspend or terminate all relationships with pre-suppliers if we identify a reasonable risk that they are purchasing from or are in business with third parties. committing serious infringements within the meaning of paragraph 1.

In relation to direct or indirect support to non-state armed groups:

3. we do not tolerate direct or indirect support to non-state armed groups in the extraction, transport, trade, processing or export of metals. Direct or indirect support to non-state armed groups in the extraction, transport, trade, processing and export of metals means, inter alia, that

non-state armed groups or their nationals are supplied with metals, receive payments or receive logistical or material support that (1*):

- illegally control mining sites or transport routes, metal trading points and upstream actors in the supply chain (2*); and/or
- illegally tax or extort money or metals at access points to mining sites or on transport routes or at metal trading points (3*); and/or
- Illegally taxing or extorting intermediaries, exporters or international traders

In relation to dealing with the risk of direct or indirect support to non-state armed groups:

4. We will immediately suspend or terminate all relationships with pre-suppliers if we identify a reasonable risk that they are purchasing from or are associated with third parties that directly or indirectly support non-state armed groups as defined in paragraph 3.

In relation to public or private security forces:

5. We agree, in accordance with paragraph 10, to stop the direct or indirect support of public or private security forces that illegally control mining areas, transport routes and upstream actors in the supply chain; that illegally tax or extort silver or metals at access points to mining areas, along transport routes or at metal trading points; or that tax or extort international intermediaries, exporters or traders (4*).

6. We recognise that the role of public or private security forces at mining sites and/or in surrounding areas and/or along transport routes must be for the sole purpose of maintaining public order, protecting human rights, ensuring the safety of workers, equipment and mine facilities, and protecting mining sites or transport routes from interference with legitimate mining and trade.

7. When we or a company that is part of our supply chain contracts with public or private security forces, we commit to ensuring that these forces are deployed in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take appropriate measures to put in place selection guidelines to ensure that no individuals or units of the security forces are deployed who are known to be responsible for blatant human rights violations.

8. We will support efforts or take appropriate measures to work with central or local authorities, international organisations and civil society organisations to help find practical solutions for greater transparency, proportionality and accountability in payments to public security forces to ensure security.

9. We will support efforts or take appropriate action to work with local authorities, international organisations and civil society organisations to prevent or reduce the exposure of vulnerable groups - particularly artisanal miners where metals in the supply chain are mined in an artisanal or small-scale manner - to the negative impacts associated with the presence of public or private security forces at mining sites.

In relation to risk management in connection with public or private security forces:

10. Depending on the company's specific position in the supply chain, we will promptly design, adopt and implement a risk management plan with upstream suppliers and other actors to prevent or mitigate the risk of direct or indirect support to public or private security forces as defined in paragraph 5, as soon as we determine that such an appropriate risk exists. In such a case, following the failure of attempts to mitigate the risk, we will suspend or terminate all relationships with an upstream supplier within six months of the adoption of the risk management plan. Once we have identified an appropriate risk of activities that are inconsistent with the provisions of paragraphs 8 and 9, we will act in the same manner.

(1*) The term 'associated enterprises' includes traders, clusterers, intermediaries and others in the supply chain who work directly with armed groups to facilitate the extraction, trade or processing of metals.

(2*) "Control" of mines, transport routes, metal trading points and upstream actors in the supply chain means: i) monitoring of mining, including access to sites, and coordinating downstream sales to international intermediaries, exporters and traders; ii) the use of any form of forced or compulsory labour for the mining, transportation, trading or sale of metals; or iii) the holding of directorships or agentships, or the ownership of profitable interests in upstream companies or mines.

(3*) "Extortion" means demanding, by threat of force or other penalty, money or metals in return for access to the mining area, access to trade routes or in return for the transportation, purchase or sale of metals.

(4*) "Direct or indirect support" does not mean the legally required forms of support, including taxes, duties and/or fees, owed by companies to the government of a country in which they conduct business.

For questions or complaints:

If you have any questions about this policy and/or wish to make a complaint, you may contact ALTICHEM by e-mail or in writing, enclosing your details:

qualite@gie-ocs.com