

## Cobalt Responsible Sourcing Policy

The development of the MANAGEM Group's Cobalt activities and the evolution of its business lines towards high value-added products, embraces the promotion of a responsible supply chain, in harmony with the Group's established values, CSR commitments, and standards<sup>1</sup>, and OECD guidance regarding mineral sourcing.

To ensure that this Cobalt supply chain is responsible and free from armed conflict or serious human rights violations, consistent with the OECD guide and its appendix II, MANAGEM Group as well as its subsidiary CTT, are committed to:

- Refraining from any action contributing to the financing of conflicts,
- Complying with the relevant resolutions on sanctions of the United Nations, the European Union and the U.S Treasury Department and where appropriate, national laws implementing such resolutions,
- Establishing effective management systems and encouraging their suppliers to do the same with theirs in accordance with the OECD “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”,
- Referring to Annex II of the OECD Due Diligence Guidance for the conception and the implementation of our risk management approach,
- Strengthening the due diligence's skills,
- Carrying out, individually or in cooperation with partners, a risk assessment in the supply chain and undertaking the appropriate mitigation measures, including suppliers' suspension in case of non-compliance with our policy,
- Developing annual reports on the Group's due diligence efforts.

The following supply chain policy depicting the commitments of MANAGEM Group and its subsidiary CTT, in accordance with the OECD “Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”, and its annex II, applies to all material suppliers and their sub-suppliers.

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<sup>1</sup> CSR charter, human Rights policy, Code of Ethics and Business Conduct, responsible purchasing charter

All the aforementioned documents can be found on MANAGEM's website: <https://www.managemgroup.com/>

## Mitigation measures for identified risks

### **Regarding risk management of serious abuses associated with the extraction, transport or trade of minerals<sup>2</sup>:**

- Immediate suspension or termination of any relationship with suppliers when a reasonable risk is identified

### **Regarding risk management of Direct or indirect support to non-state armed groups<sup>3</sup>:**

- Immediate suspension or termination of any relationship with suppliers when a reasonable risk is identified

### **Regarding risk management of Public or private security forces<sup>4</sup>:**

- Immediate suspension or termination of any relationship with suppliers after the failure of risk mitigation attempts within six months of the adoption of the risk management plan

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

- Analysis and development of the action plan in collaboration with suppliers and other relevant stakeholders
- Immediate suspension or termination of any relationship with suppliers after the failure of risk mitigation attempts within six months of the adoption of the risk management plan.

Imad TOUMI

Chief Executive Officer



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<sup>2</sup> Serious abuses as defined in Annex II of OCDE guidance: any forms of torture, cruel, inhuman and degrading treatment; 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; the worst forms of child labour; other gross human rights violations and abuses such as widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

<sup>3</sup> Non-state armed groups or their affiliates that: illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or; 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; illegally tax or extort intermediaries, export companies or international traders.

<sup>4</sup> 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.