Centalion

Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas

VERSION / DATE	DESCRIPTION	PREPARED / OWNER	REVIEWED	APPROVED
V1 July 2025	Centalion's approach to sourcing of metals and minerals	Sustainability Specialist	Senior Legal Counsel	Global Head of Ethics and Sustainability

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1.
SCOPE

This policy covers all of Centalion Group, including its fully owned and majority-controlled subsidiaries and joint ventures. All Centalion employees and management must comply with this policy across the entire supply chain of minerals from conflict-affected and high-risk areas. We encourage our suppliers and business partners to adopt similar policies.

- Centalion recognises the risks of significant adverse impacts associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas.
- We also recognise that we have the responsibility to respect human rights and not contribute to conflict.
- We are committed to responsible sourcing. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions and applicable law.

This policy should be read in conjunction with the following policies:

1. Code of Conduct and Ethics
2. Code of Conduct & Ethics for Centalion's Business Partners
3. Health, Safety, Environment, Human Rights and Communities Policy
4. Modern Slavery Policy
5. Ethics & Sustainability Report
6. Speak Up Policy
7. Payments to Governments
8. Tax Governance Framework

2.

REGARDING SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF MINERALS:

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:

- any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labour;
- 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.

3.

REGARDING DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS:

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:

- 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.

4.

REGARDING PUBLIC OR PRIVATE SECURITY FORCES:

We do not directly or indirectly support 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.

5.

REGARDING RISK MANAGEMENT OF (A) SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF MINERAL, (B) DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS AND (C) PUBLIC OR PRIVATE SECURITY FORCES:

Where we identify a reasonable risk that any of the events listed under paragraphs 1 to 3 above may occur, we will take all appropriate measures to identify, prevent and bring to an end any such risks, and where this is not possible, mitigate and remedy all instances where Centalion and any party involved in any such events may profit from, contribute to, assist with or facilitate such risk materialising. In instances where these measures fail, we reserve the right to suspend or discontinue engagement with upstream suppliers or any entity involved in any such events after failed attempts at mitigation.

6.

REGARDING BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS:

We do not offer, promise, give or demand any bribes, and we 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.

7.

REGARDING MONEY LAUNDERING:

We 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.

8.

REGARDING THE PAYMENT OF TAXES, FEES AND ROYALTIES DUE TO GOVERNMENTS:

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).

9.

REGARDING RISK MANAGEMENT OF BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS, MONEY-LAUNDERING AND PAYMENT OF TAXES, FEES AND ROYALTIES TO GOVERNMENTS:

We commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.