

## Gold, Silver , Platinum , and Palladium Supply Chain Policy

### Objective

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting materials from conflict-affected and high-risk areas, and recognising that we, at JX Metals Smelting Co., Ltd., have the responsibility to respect human rights, ESG and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of gold/silver/platinum/palladium and gold/silver/platinum/palladium-bearing materials from conflict-affected and high-risk areas. 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 or, where applicable, domestic laws implementing such resolutions.

- ii) any forms of forced or compulsory labour;
- 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.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as these.

Support for a multilateral cooperation initiative for responsible resource development

Public or private security forces

We, at JX Metals Smelting Co. Ltd.

y Agree to eliminate 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 e at 44 (i) Tj -Tj 0 Tc 0 0 Td ( ) T0Tw

with upstream suppliers to prevent or mitigate the risk of direct or indirect supply or private security forces, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify high risk activities of upstream suppliers, we will respond in the same vein.

Payment for gold/silver/platinum/palladium and gold/silver/platinum/palladium-bearing materials

We will make and receive payment for gold/silver/platinum/palladium and gold/silver/platinum/palladium-bearing materials through appropriate financial institutions without exception.

Bribery and fraudulent misrepresentation of the origin of materials, 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.

Establishment of a confidential grievance mechanism

We will develop a mechanism which allows all our employees or external stakeholders to anonymously report concerns about our gold/silver/platinum/palladium supply chain. The grievance mechanism should be based on, but not limited to, the following principles:

- Accessible: The mechanism should be known and usable by all intended users without fear of reprisal, and should include considerations for language, literacy, costs, physical location and technology.
- Independent: The mechanism should have a formal and independent oversight structure (e.g., the Refiner's Compliance Department) that ensures parties cannot interfere with fair conduct.
- Respectful: All complaints should be treated seriously and with respect.
- Transparent: The mechanism should have procedures to keep parties informed about the progress of their grievances through each stage and should provide sufficient information to build confidence in its effectiveness and meet any public interest reporting requirements.
- Contribute to continuous learning: The mechanism should provide a source for identifying lessons for improving both the mechanism and preventing future grievance and harm.