

## **SUPPLY CHAIN POLICY OF HUTA CYNKU “MIASTECZKO ŚLĄSKIE” S.A. SEATED IN MIASTECZKO ŚLĄSKIE (POLAND) FOR A RESPONSIBLE GLOBAL SUPPLY CHAIN OF MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS**

Huta Cynku „Miasteczko Śląskie” S.A. (hereinafter referred to as HCM S.A.) is a company engaged in activities in the field of processing of zinc-lead ores and zinc oxides, recycling of minerals as well as metallurgical activities, including in particular the production of rectified zinc, galvanizing and foundry alloys as well as sulfuric acid.

Recognizing the risk of significant negative impacts that may be associated with mineral extraction, trade, processing and export from conflict-affected and high-risk areas, and recognizing that it is HCM S.A.'s corporate responsibility to respect human rights and not to contribute to conflicts, HCM S.A. adopts this Policy on responsible sourcing of minerals from conflict-affected and high-risk areas (hereinafter referred to as the Policy).

This Policy is based on the current OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (hereinafter the OECD Guidelines).

HCM S.A. undertakes to widely disseminate and include in contracts or agreements with suppliers this Policy as a common point of reference for conflict-sensitive mineral sourcing practices and suppliers' knowledge of risk - from the extraction site to the end user.

In addition, HCM S.A. undertakes to refrain from any activities that contribute to the financing of conflicts, and we hereby undertake to comply with relevant UN sanction resolutions or, where applicable, national laws implementing such resolutions.

1. When sourcing minerals from, or conducting business in, conflict-affected and high-risk areas, HCM S.A. will not tolerate or in any way benefit from, contribute to, assist or facilitate the following acts by any other entity whatsoever:
  - all forms of torture or cruel, inhuman and degrading treatment,
  - any form of forced or compulsory labor, meaning work or service that is required of any person under threat of punishment and for which that person has not volunteered,
  - the worst forms of child labor (within the meaning of the International Labor Organization Convention No. 182 on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor (1999)),
  - other serious 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.
2. HCM S.A. stipulates that it will immediately suspend or terminate cooperation with suppliers of raw materials if it finds that there is a justified risk that those suppliers purchase from any entity that has committed serious abuses listed in Point 1 above.
3. HCM S.A. will not tolerate any direct or indirect support to non-state armed groups through mining, transportation, trade, processing or export of minerals.

"Direct or indirect support" to non-state armed groups by mining, transporting, trading, processing or exporting minerals includes, but is not limited to: purchasing minerals from non-state armed groups or entities associated with them, making payments to them or otherwise providing logistical assistance or equipment to such groups or entities that:

  - unlawfully control mining sites or otherwise control transport routes, mineral trading points and upstream actors in the supply chain; or
  - unlawfully tax or extort money or minerals at access points to mines, along transportation routes, or at points where minerals are traded; or
  - unlawfully tax or extort money from intermediaries, exporting companies or international trading companies.

4. HCM S.A. stipulates that it will immediately suspend or terminate cooperation with suppliers of raw materials, if it finds that there is a justified risk that those suppliers purchase from any entity that provides non-state armed groups with direct or indirect support as defined in Point 3 above, or are with such affiliated entity.
5. HCM S.A. will not offer, promise, give or demand any bribes and we will not solicit bribes to conceal or alter the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for mineral extraction, their trade, processing, transport and export.
6. HCM S.A. will support efforts or take actions aimed at contributing to the effective elimination of money laundering, where we identify a reasonable risk of money laundering arising from the extraction, trade, transport or export of minerals, related to the illegal imposition of taxes or extortion of minerals at mine access points, along transport routes, or at points where minerals are traded by raw material suppliers, or the risks associated with such activities.
7. HCM S.A. 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, consistent with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set out in the Extractive Industries Transparency Initiative (EITI).
8. In accordance with the specific position of HCM S.A. in the supply chain, we undertake to cooperate with suppliers, central or local government authorities, international organizations, civil society and, where applicable, third parties concerned, in improving and tracking performance so as to prevent or reduce the risk of adverse effects by taking measurable actions within a reasonable timeframe. We will suspend or terminate cooperation with raw material suppliers after unsuccessful attempts to mitigate risk.
9. Any phrases, terms or definitions used in this Policy should be interpreted in accordance with the OECD Guidelines and the legal provisions referred to therein.