

Responsible Sourcing Policy

> OUR COMMITMENT

IXM is committed to ethical and sustainable business practices in its supply chain¹, which includes responsible sourcing of minerals. IXM Responsible Sourcing Policy (the “Policy”) outlines IXM’s commitment to continuously carry out appropriate due diligence in the mineral supply chain and ensure responsible sourcing of **minerals in line with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”)** and the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc (“JDDS”).

IXM is also committed to monitoring social, health & safety, and environmental risks when conducting due diligence in its mineral supply chain.

This Policy is consistent with IXM’s commitments to ethical business conduct and to respecting human rights as outlined in CMOC’s Group Code of Business Conduct and other relevant policies of IXM.

> APPLICABILITY AND EXPECTATIONS OF RELEVANT PARTIES

This Policy **applies to all senior management and employees of IXM globally.**

IXM is committed to fostering long-term engagement with its Suppliers and expects them to share the same commitments for ethical and sustainable business practices. The **IXM Supplier Code of Conduct** outlines general requirements and expectations for Suppliers. It is legally binding and shared with all Suppliers. Following a risk-based approach, IXM organises Supplier training and/or capacity-building initiatives on responsible sourcing requirements.

To support transparent and open communication on priorities concerning responsible sourcing, IXM actively engages with relevant stakeholders and organisations. Most importantly, IXM makes use of a [Raising Concerns](#) tool, which serves as a grievance and remediation mechanism for internal and external stakeholders, enabling them to confidentially report any concerns relating to IXM’s responsible sourcing practices without fear of retaliation.

¹ The term supply chain refers to the system of all the activities, organisations, actors, technology, information, resources, and services involved in moving the mineral from the extraction site downstream to its incorporation in the final product for end consumers. (Source: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas).

> RESPONSIBLE SOURCING PRINCIPLES

Human Rights

Recognising the risks of adverse human rights impacts and conflict associated with the extraction, trade, handling and export of minerals from conflict-affected and high-risk areas, IXM will neither tolerate nor in any way assist with, contribute to, facilitate the commission by any party of or profit from any forms of human rights violations or abuses in its supply chain. This includes:

- 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 ²
- other gross human rights violations and abuses, such as globally widespread sexualised violence;
- war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

IXM will immediately suspend or terminate relationship with a Supplier where it identifies a reasonable risk that the Supplier is committing or sourcing from or linked to any party committing serious human rights violations or abuses listed above.

Security forces and non-state armed groups

IXM will not tolerate any direct or indirect support to public or private security forces, non-state armed groups or their affiliates, who illegally control mine sites, transportation routes and upstream actors, or who are involved in illegal taxing or extortion in connection with the extraction, transport, trade, handling or export of minerals in its supply chain. If any of IXM Suppliers contract public or private security forces, IXM expects its Suppliers to comply with the Voluntary Principles on Security and Human Rights³.

² As defined in the ILO Convention (No. 182) in 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

³ The Voluntary Principles on security and human rights, developed in 2000 jointly by governments of the United States and the United Kingdom, companies and non-governmental organisations as part of a dialogue on security and human rights.

If IXM identifies any of the above risks in its supply chain, it will implement an appropriate risk mitigation strategy which may include suspending or discontinuing trade with the affected Supplier depending on the severity of risks identified and mitigation actions taken.

Financial crime and transparency

IXM will not offer, promise, give, accept or receive or solicit a bribe, assist in any forms of bribery, and other actions violating any local and applicable anti-corruption laws. IXM will resist the solicitation of bribes to conceal, disguise or misrepresent the origin of minerals or payments to governments and will work towards eliminating money laundering risks.

IXM will ensure that all taxes, fees and royalties related to mineral trade that are due by IXM are paid to the governments and IXM expects the same of its suppliers regarding mineral extraction, trade and export. Furthermore, IXM will ensure that information on such payments is disclosed in line with international standards and good practice frameworks relevant to its trading operations.

IXM will engage with Suppliers and other relevant stakeholders to prevent or mitigate financial crime risks and promote transparency in its supply chain.

For further information on IXM's commitment to ethical business conduct, please refer to **CMOC's Group Code of Business Conduct** and other relevant policies of IXM.

Environment, Health & Safety

IXM will not tolerate abuses or violations of applicable national and international environmental, labour, and health & safety laws and regulations in its supply chain.

If IXM identifies any of the above risks in its supply chain, and depending on the severity of the risks identified, IXM will engage with its Suppliers and other relevant stakeholders to prevent or mitigate these risks. IXM may decide to suspend or discontinue trade after failed attempts of mitigation.

➤ **RESPONSIBLE SOURCING MANAGEMENT SYSTEM**

IXM has established a Responsible Sourcing Management System ("RSMS") and an overarching Responsible Sourcing Procedure to manage OECD Annex II risks in its supply chain in line with stakeholder expectations, leading industry practices, the internationally-recognised good practice framework of the OECD Guidance - the Five-Step Framework for Risk-Based Due Diligence, and the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc ("JDDS"). Based on these last two frameworks, IXM:

Establishes strong systems of responsible sourcing management;

This includes:

- the publicly available IXM Responsible Sourcing Policy and the IXM Supplier Code of Conduct, specifying IXM's responsible sourcing commitments as well as requirements and expectations from Suppliers;
- internal management structure to support responsible sourcing and supply chain due diligence and efficiently communicate critical information to internal and external stakeholders;
- Internal material control and a system of controls and transparency over the supply chain, including the identification of upstream Suppliers where applicable; and
- CMOC's group-level grievance mechanism that any affected stakeholder can use to raise concerns regarding the circumstances of extraction, trade, handling and export of minerals in IXM's supply chain more broadly.

Implements a process to identify and assess OECD Annex II risks in its mineral supply chain;

This includes conducting an ongoing risk assessment and incident monitoring in its supply chain;

Designs and implements measures to respond to any identified risks;

This includes:

- reporting on the results of OECD Annex II risk assessment in IXM's supply chain to senior management;
- developing measurable risk mitigation plans in consultation with relevant stakeholders where necessary;

- monitoring processes for the implementation of risk mitigation actions; and
- reporting the results of risk management to senior management.

Commits to report publicly on responsible sourcing efforts;

Disclose information on responsible sourcing as part of IXM's annual Sustainability Report and other means, with due regard to business confidentiality and other competitive concerns. The reporting includes the following elements:

- relevant responsible sourcing and supply chain due diligence policies and practices;
- grievances received and addressed;
- the results of supply chain risk assessments; and
- risk mitigation activities.

> ACCOUNTABILITY

IXM's Responsible Sourcing Policy is published on IXM's website and communicated internally and externally as applicable. The IXM HoCIR (Head of Compliance, Insurance and Risk) has overall responsibility for the Policy implementation.

IXM will track the performance and review the effectiveness of the Responsible Sourcing Management System, supporting the implementation of the Policy, and make necessary updates to the management system at least annually or where there is a significant change of circumstances to ensure its continuous improvement.

> EFFECTIVENESS AND INTERPRETATION

This Policy shall come into force on the date of signing by IXM CEO. This Policy shall be interpreted by the Compliance Department of IXM.

> REPORTING VIOLATIONS OF THIS POLICY

All our stakeholders are encouraged to report any grievances linked to this Policy or suspected violations of it via IXM [Raising Concerns](#) tool. The complaints can be made anonymously and IXM will ensure protection of the reporting person from any form of retaliation.