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Responsible Sourcing Policy

As a company committed to taking responsibility for human rights, environment, and social issues, we conduct third-party evaluations to prevent problems that may occur in the supply chain in advance.

Cosmo chemical is aware of and actively supports the international efforts to investigate, monitor and mitigate activities that contribute to illegal armed groups, human rights violations, or financial wrongdoings in Cobalt supply chains as defined in Annex II of the Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas Third Edition (OECD Guidance).

Cosmo chemical respects the dignity and importance of human rights and considers any mineral that may pose risks of contributing the harm listed in Annex II of OECD Guidelines and Cobalt Refiner Supply Chain Due Diligence Standard to be 'conflict minerals'. Cosmo chemical will only purchase Cobalt-containing materials from sources that have been verified as not involving or contributing to illegal armed groups, human rights violations, or financial wrongdoings as listed here:

Annex II of the OECD Guidance

Serious abuses associated with the extraction, transport or trade of minerals:

- o Any forms of torture, cruel, inhuman and degrading treatment;
- o Any forms of forced or compulsory labor;
- o The worst forms of child labor;
- o Other gross human rights violations and abuses such as widespread sexual violence;
- o War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- o Direct or indirect support to non-state armed groups.
- o Direct or indirect support to public or private security forces.
- o Bribery and fraudulent misrepresentation of the origin of minerals.
- o Money laundering.
- o Non-payment of taxes, fees and royalties to governments.

o Safety and health conditions unsuitable for maintaining the physical and mental health of miners or direct or indirect employees.

In support of the above, all of Cosmo chemical's relevant staff members are directed to follow and trained on procedures to implement a conflict minerals due diligence system that aims to:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Guidance and the Responsible Business Alliance's Responsible Minerals Assurance Process (RMAP) and encourage our suppliers to do the same.
- Provide, and expect our suppliers to cooperate in providing, due diligence information
 to confirm Cobalt-containing material in our supply-chain does not contribute to illegal
 armed groups, human rights violations, or financial wrongdoings as defined in Annex II
 of OECD Guidance.
- Immediately discontinue engagement with suppliers who pose a reasonable risk to be supporting conflict.
- Undergo an annual RMAP assessment to verify our conflict-free status as well as identify opportunities to continually improve our conflict minerals due diligence management system.
- Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders and the public (as required).
- Should actual or potential risks of harm be identified, the company will work with relevant stakeholders to develop a risk mitigation plan with with concrete actions and associated timelines, and tailored to the situation
- Aim to establish long-term relationships with our immediate suppliers.
- Consider ways to support and build capacities of cobalt supplying counterparties to improve
- Performance and conform to this supply chain policy.
- Suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Any concerns about our policy or due diligence system should be reported to Responsible Minerals Initiative through its grievance mechanism that can be accessed <u>here</u>.

(http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-anagement/grievance-mechanism/)

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