



## CODE OF CONDUCT

This code of conduct is a statement of Specialty Metals Resources' business philosophy, ethics and working principles. It applies to each and every employee of the company. Each non-compliance shall be reported immediately to the board of directors so proper action can be taken.

### Human Rights and Labor

SMR does not tolerate any abuses of general human rights and has a high focus on health, safety, privacy and social responsibility for its employees. We ensure no child labor or any form of forced labor, involuntary prison labor, slavery or trafficking of persons shall be used. This includes by means of threats, forcing, fraud or abduction for the purposes of exploitation. All employees are free to terminate their employment at any time. SMR ensures no employees are required to hand in any passports, work permits or any other government related documents as a condition for employment.

At SMR we recognize that each and every employee is unique and should be respected for their individual capabilities and shall receive equal employment opportunities. We do not tolerate any discrimination, harassment or offence based on gender, race, color, religion, age, ethnic or national origin, cultural background, social group, disability, sexual orientation, marital status, pregnancy, political affiliation, union membership or/and family status.

Every employee receives a fair compensation for the his/her work solely related to work criteria and never based on the forms of discrimination stated above. We ensure we are conform with any international, national, regional, local laws, rules, regulations or/and agreements regarding working hours and applicable legal minimum levels of wages. In compensation for overtime employees are compensated at an hourly rate higher than the normal hourly rate.

### Health and Safety

SMR ensures that every employee is trained about identifying potential hazards, avoiding work related injuries and reporting any health and safety issues in the



workplace. Where potential hazards cannot be controlled by means of proper design, engineering, preventive maintenance, etc. the employees will be provided with personal protective equipment that is being replaced, washed or/and cleaned regularly. Any known potential hazard (biological, chemical, physical,...) shall be checked regularly and necessary actions shall be taken appropriately. When performing heavy duty tasks employees will be informed on how to properly and most ergonomically perform these tasks.

Emergency plans and response procedures shall be implemented in order to minimize the impact of an emergency event. These procedures shall be executed, practiced or/and performed on a regular basis according to OHSAS guidelines.

## Environmental

Next to health, safety, privacy and social responsibility towards its employees or/and the community they belong to, SMR has a high focus on environmental responsibility. any negative effects on the community, environment or/and natural resources are minimized while still safeguarding the business flow and safety of the public. SMR ensures to be in possession of any legally necessary documents regarding environmental permits, mining license, exporting license and others.

All types of waste, harmful for the environment, will be safely handled in a correct way in order to minimize and if possible eliminate any form of environmental damage. Possible forms of waste include chemicals, waste water, solid waste and air emissions.

## Conflict of interest, Integrity and Ethics

Each and every employee shall always work in the company's interest and never for personal interest. Any situations where personal interest of an employee and the interest of the company could meet should be avoided at all times. when an employee is confronted with a possible conflict of interest he or she shall immediately inform his or her superior. Every employee shall always maintain the highest form of business integrity and not accept nor offer any form of bribery or perform any form of corruption. Accepting or/and offering gifts shall always remain modest. Any form of monetary or other favors that could change the



employees or/and companies integrity or/and independence should be refused at all times.

Each and every employee shall respect all forms of intellectual property rights, including information regarding business activities, trade secrets or practices. When accidentally confronted with high confidential information he or she shall not communicate this to other employees. All information regarding the company's performance shall remain strictly confidential unless otherwise stated or permitted.

Each employee shall use SMR's assets for its intended use and shall never intentionally brake or destroy any of these assets. The use of SMR's assets (financial, physical and others) for purposes not directly related to the SMR business is prohibited without permission of the employees direct superior. No arrangements with competitors or market partners shall be made on pricing, customers or/and specific market sections. We fully support the antitrust laws and all rules of fair competition.

### Mineral Sourcing

SMR assures that any activity whether it being trading, tolling or marketing of conflict minerals is totally conflict free. These conflict minerals are tantalum, tungsten, tin and gold according to the US Security and Exchange Commission (SEC) and Section 1502 of the Dodd–Frank Wall Street Reform and Consumer Protection Act (2010). This includes the above mentioned metals that originate from the Democratic Republic Congo and the adjacent countries. A due diligence is performed on the source and supply chain of these minerals.

### Disclaimer

This code of conduct is a statement of SMR's ethical business philosophy and working principles. It does not create any right for any customer, supplier, (sub)contractor, shareholder or any other person or entity.