

NeoNickel Limited

Ethical Trading Policy

1. About this policy

- 1.1. It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to modern slavery and human trafficking, bribery and corruption and trading in conflict minerals (collectively the “**Unethical Activities**”) and are committed to ensuring that no such Unethical Activities are taking place in any part of our own business or those of our suppliers.
- 1.2. We reserve the right to amend this policy at any time.

2. Our approach

- 2.1. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that we operate in an ethical manner.
- 2.2. **Modern Slavery:** We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 2.3. **Bribery & Corruption:** All forms of bribery and corruption are strictly prohibited within our business. This includes any activity which would be an offence under the UK Bribery Act 2010 and the US Foreign Corrupt Practices act 1977 such as offering, promising, giving, accepting or seeking a bribe, which itself may take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. We also require our suppliers to respect and comply with this prohibition.
- 2.4. This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services.

- 2.5. **Conflict Minerals:** We support eliminating the risk of financing armed groups and human rights abuses through sourcing and trading specific minerals (including gold, tin, tantalum and tungsten, the derivatives of cassiterite, columbite-tantalite and wolframite) from the Conflict Region (eastern portion of the Democratic Republic of Congo (DRC) and surrounding countries). We fully support the objective of section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act 2010 and the related OECD Guidance and do not knowingly procure such metals or minerals which originate from conflict-affected and high-risk areas that are not certified as “conflict free”. We also require our suppliers to respect and comply with this.
- 2.6. All those working for us or on our behalf or who are suppliers to us are encouraged to raise concerns about any issue or suspicion of any Unethical Activities in any parts of our business or our supply chains (including within the business of any supplier) at the earliest possible stage and are required to fully co-operate with any investigation conducted by us or on our behalf relating to the same.

3. Our practices and procedures

- 3.1. As part of our initiative to conduct our business in an ethical and transparent manner and to identify and minimise all risks of Unethical Activities in our supply chains, we are implementing the following practices and procedures:
- 3.1.1. undertaking due diligence on our suppliers by considering the extent to which they have in place appropriate policies prohibiting Unethical Activities;
 - 3.1.2. requiring our suppliers to confirm in writing that all materials supplied to us originate from outside any conflict region or from mines or smelters which have been certified as “conflict free” by an independent third party;
 - 3.1.3. arranging for all of our managerial staff to receive training on slavery and human trafficking;
 - 3.1.4. contractually obliging our suppliers to comply with all laws and regulations relating to the Unethical Activities; and
 - 3.1.5. we are planning to operate a system of self-evaluation for all of our suppliers to assess their compliance with relevant legislation applicable to Unethical Activities.

4. Breaches of this policy

- 4.1. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 4.2. We may terminate our relationship with other individuals and organisations working on our behalf or supplying to us if we become aware that their business activities are not in accordance with the requirements of this policy.