



ESG POLICY

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1. INTRODUCTION

Open Mineral AG and all its affiliated companies (together referred to as '**OM Group**') recognise the significant impact our trading activities can have on the environment and society, and we are committed to, through the integration of environmental, social and governance ('**ESG**') principles into our business practices, minimise the potential adverse effect of our business operations may cause.

This policy outlines OM Group's commitment to responsible and sustainable sourcing and performance of our trading operations, globally and acts as a framework for incorporating our policies, standards and management systems that support our efforts to achieve our ESG goals.

OM Group's vision, values and principles in relation to ESG and sustainability are encapsulated in this policy and it forms an important cornerstone of our ESG and sustainability programme.

2. ENVIRONMENTAL RESPONSIBILITY

As an environmentally aware company, OM Group regularly evaluates the impact its business operations have on the environment and is committed to responsibly minimising it. OM Group, although not an owner of productive assets, acknowledges that trading decisions can influence environmental outcomes and therefore, in order to mitigate adverse environmental effects through trading operations, OM Group strives to:

- Conduct due diligence on its counterparties to ensure they comply with applicable environmental laws, regulations and standards.
- Consider environmental factors when making trading decisions, including sourcing metals from responsible suppliers upholding environmentally friendly practices.
- Encourage its suppliers and counterparties to adopt sustainable practices and reduce their carbon footprint.
- Collaborate with industry stakeholders to promote sustainable trading practices and support initiatives aimed at reducing the impact of metal trading activities on the environment.
- Continue to develop OM Group's digitally driven platform which provides for transparent commodity tracking to source and allows for the development of emissions reduction solutions.

3. SOCIAL RESPONSIBILITY

In accordance with OM Group's Human Rights Policy and Responsible Sourcing Policy, we are committed to upholding human dignity and the associated fundamental freedoms as well as ensuring responsible sourcing of minerals and metals (hereinafter '**products**') during the course of conducting our business.

OM Group's onboarding process applicable for all counterparties, allows us to identify any red flags or harmful impacts caused by potential producer, supplier, seller, buyer, service provider or any other person, corporate body, partnership or similar with which OM Group might enter into or conduct any form of business relation with. This process allows OM Group to mitigate risks in relation to conducting business relating to products from conflict-affected and high-risk areas, where there is reasonable concern of the involvement of child labour or possible human rights violations.

In addition, OM Group strives to achieve its goals relating to its social responsibility by:

- Engaging with its suppliers and customers to ensure they adhere to ethical labour practices and adhere to applicable standards and guidelines, including but not limited to OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-

Risk Areas, to promote and respect good labour practices and human rights during the course of their operations, activities and supply chains.

- Implementing suitable strategies to continuously assess and respond to any identified risks in supply chains.
- Working with supply chains to integrate labour and human rights performance aspects into their respective management systems in order to raise awareness for responsible sourcing.
- Disengaging from third parties that do not meet OM Group's supplier standards or where they are unable to produce relevant information and data upon request.
- Providing transparency and accountability in our trading operations.

4. GOVERNANCE PRACTICES

OM Group is dedicated to maintaining high standards of corporate governance and transparency in its trading operations through its policies and procedures which are implemented and enforced throughout the business.

To ensure accountability and integrity across the OM Group, we have and continue to:

- Maintain an established governance structure and internal controls to oversee trading activities and manage risks effectively.
- Promote ethical conduct and integrity among employees, suppliers and trading partners.
- Maintain accurate and transparent reporting of activities relating to ESG compliance.
- Ensure continuous compliance with all relevant laws, regulations and industry standards governing metal trading activities.

5. COMPLIANCE, OVERSIGHT AND GOING FORWARD

This ESG policy along with all resources related to it is communicated to all OM Group employees, contractors, suppliers, customers and all other relevant stakeholders. Compliance with the provisions set out herein and in all the related resources is mandatory for all individuals related to OM Group without exception.

OM Group's management oversees the implementation of this policy and shall ensure its effectiveness through regular monitoring of its implementation. The management of OM Group shall ensure that the provisions set out in this policy are regularly updated in accordance with all applicable laws, regulations and standards in order to ensure OM Group continues to work towards achieving its vision, values and principles in relation to ESG and sustainability.

---END OF POLICY---