



MINING SOLUTIONS POLICY

Supplier Code of Conduct

Draslovka



Pavel Brůžek Jr.
CHIEF EXECUTIVE

Message from the CEO

Draslovka colleagues,

For over 100 years, the art of Draslovka cyanide chemistry has been passed from generation to generation. Today, Draslovka evolved into a global, science-based company producing chemicals that are used in wide range of sectors including agriculture, mining, automotive and pharmaceuticals.

Draslovka products are also essential in the production of many items we use in our daily lives.

Our values have helped us create a culture where every one of us is encouraged to act like a business owner, reimagine what is possible, and make decisions that are in the best interest of our customers and shareholders, while protecting our people and communities where we live and work. To help you understand our core values and your personal accountability to deliver on them, we have our Code of Conduct, a living document that we update regularly.

Our Code of Conduct establishes a shared set of values and standards to which all of us are expected to adhere. It is designed to guide our actions and help us make the right decisions, even when it is hard to do so. As we grow and face new challenges, remember that what we must never change is our undertaking to do the right thing.

Our Code of Conduct is only as strong as our commitment to follow it. It is essential not just to read it, but to understand, and live by its principles every day. Please refer to it regularly, so that it becomes your guide on how to conduct business within, and on behalf of, Draslovka. Speak up if you suspect any violation of its principles. Seek help if you are ever in doubt as to what our Code says, what actions are appropriate or what your duties are in upholding the Code. We each have an obligation to hold ourselves and each other accountable.

Thank you for making Draslovka what it is today and for your continuous dedication to our values and integrity.

Sincerely,

Pavel Brůžek Jr.

Chief Executive Officer

Document Information

Name: Supplier Code of Conduct
 Type: Policy
 Policy No.: MSP_P&L_004_v1

Area: Procurement
 Responsible function: Procurement and Logistics Director
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 Frequency of review: Every two years

Approvals (based on Company’s corporate processes)

Company	Location	Applicable (Yes/No)	Approved by Company Lead
Covoro Mining Solutions, LLC	Tennessee, United States	Yes	Jason Painter
Covoro Mining Solutions Canada Co.	Nova Scotia, Canada, Canada	Yes	Chris Connors
Covoro Mining Solutions Mexicana, S. de R.L. de C.V.	Ciudad de México, Mexico	Yes	Joaquin Corres
Draslovka Chile Limitada	Santiago province, Chile	Yes	Joaquin Corres

Document history

Version Number	Date of Issue	Reason for Change	Person in Charge
MSP_P&L_004_v1	1 December 2022	Original Issue	Isabel Jimenez

Confidentiality Statement

All information contained in this document is Internal. It does not contain confidential information and can be shared with relevant external third parties.

1 Purpose and Scope

1.1. Purpose

The Supplier Code of Conduct is designed to ensure that our suppliers adhere to high standards of safe working conditions, fair and respectful treatment of employees, and ethical practices.

1.2. Scope

This Policy is mandatory and applies to Draslovka Group: all directors, officers, employees, and suppliers of Mining Solutions Companies.

This Policy applies insofar as it does not contradict local legislation. The implementation of this Policy in a Company shall be proportionate taking into account size and internal organization of a Company and the nature, scale and complexity of its activities.

1.3. Related Documents

Draslovka Code of Conduct available at Draslovka [webpage](#).

2 Draslovka Values

Our values are simple yet powerful, and our focus on delivering efficiency and results for our customers never overshadows our commitment to ethical behavior in all we do. We expect our suppliers to be familiar with our values and to abide by them as well. When we all do what’s right for our people, partners, shareholders and communities, success will follow.

We constantly reimagine what is possible:

- Creativity
- Problem-solving
- R&D focus
- Leading our industries forward
- Crossing traditional boundaries

We put safety first:

- Product delivery
- Environmental care with the “Leave no trace” ideal
- Lifecycle risk mitigation
- Full compliance with all national regulations and leaders in international best practices

We build strong relationships:

- Customers
- Employees
- Suppliers
- Local communities
- Industry stakeholders

We act like business owners:

- Founder-led
- Personal approach
- Accountability
- Excellence
- Sustainability
- Long-term focus
- Rewarding performance
- Ambitious financial and business goals
- Importance of reputation for management

We always do the right thing:

- Transparency
- Ethical behavior
- Personal integrity
- Leveraging diversity

3 Draslovka Identity

- **Focused on the future of our planet:** Developing products and practices that leave our planet better than it was yesterday.
- **A global supplier with a family business approach:** Providing dedicated, personal service to our customers around the world.
- **An international team driven by a shared vision:** Working across geographies with a conscious ambition to be the best at what we do.
- **Experts and innovators in chemistry:** Developing products and practices that leave our planet better than it was yesterday.
- **World leaders in manufacturing excellence:** Committed to safely and efficiently producing quality products.
- **Empowering our people:** Supporting every person in our organization to help them realize their full potential and lead our company forward.

4 Ethical Practices

The health of our company and of our suppliers rests on a firm foundation of ethical behavior. We do what's right for our customers, colleagues, and communities always.

We promote a speak up culture that does not tolerate retaliation. Suppliers must speak up and notify Draslovka if they are aware of or suspect any unethical or illegal conduct impacting or involving our company. The [Draslovka Ethics Hotline](#) is available 24 hours a day to report a concern or ask a question.

4.1. Compliance with Laws

Regardless of where we work, Draslovka follows all applicable laws, rules, and regulations, even though they may be complex and subject to change. This is also true when laws differ from country to country. We expect our suppliers to do the same and to use their best efforts to implement these standards with their suppliers.

Guidance for Suppliers:

In dealing with or on behalf of Draslovka, suppliers must abide by all applicable antitrust and competition or trade control laws in countries of operation.

Our suppliers must obey the trade laws of the United States and all countries of operation, including but not limited to laws and regulations concerning:

- The import or export of goods, services, or technology.
- Government licenses or other approvals required to conduct transactions.
- Sanctions prohibiting transactions with specific countries, companies, or individuals.
- Product classification, valuation, labeling and transportation.

4.2. Anti-Corruption

Draslovka's commitment to compliance and integrity means we all play a part in the effort to eliminate bribery and corruption worldwide. We strictly follow anti-bribery and anti-corruption laws and expect our suppliers to do the same.

Guidance for Suppliers:

- Our suppliers must work against corruption and act in accordance with all laws related to bribery, including the Foreign Corrupt Practices Act, and other applicable local laws.
- Our suppliers must not engage in any form of bribery or extortion to secure advantage on behalf of Draslovka, including facilitating payments.
- Our suppliers should not use illegal or inappropriate means to win business or obtain preferential treatment for Draslovka. This includes improperly securing favorable tax or customs treatment, receiving permits or regulatory approvals, or bypassing laws or regulations.
- Draslovka discourages giving or receiving gifts and significantly limits the value of gifts which can be received by employees.
- Supplier records provided to Draslovka must accurately reflect the value and nature for all transactions.
- All business and commercial dealings are transparently performed and accurately recorded on the supplier's books and records. There shall be no actual or attempted participation in money laundering.

4.3. Protection of Information and Property

At Draslovka, we handle the data of our employees, customers, suppliers, and third parties with care and according to law. IT is our responsibility to handle all types of data in a secure and appropriate manner, and to take all precautions to keep it safe. We require suppliers to treat our information and property in the same way.

Guidance for Suppliers:

- Suppliers will implement sufficient measures to protect any Trade Secrets or Confidential Information provided during business transactions.
- Suppliers will follow all relevant data privacy regulations.
- Suppliers will comply with all applicable data protection laws to protect personal information and will enter into appropriate data protection agreements and will handle Personally Identifiable Information according to the requirements of those agreements.
- Information should be provided to suppliers' employees on a "Need to Know" basis only.
- Documents containing confidential information no longer needed by the suppliers to conduct business on behalf of Draslovka should be either returned to Draslovka or destroyed consistent with Draslovka instructions.
- Suppliers must make sure they have the required approvals before accepting any external invitation to share Draslovka expertise or information.
- No confidential information in the suppliers' possession regarding Draslovka should be used to either engage in or support insider trading.

5 Labor, Safety, and Quality Practices

Draslovka backs our commitment to our communities with an equally strong commitment to fair employment practices and an utmost duty to uphold the highest standards of human rights. We believe all injuries and occupational illnesses are preventable and strive to have zero injuries in the workplace. Draslovka and its suppliers shall enforce standards of conduct to ensure that every employee is confident and feels safe in an open and trusting environment. Together, with our business partners, we are building a culture where all people are included, and differences are a source of strength and cause for celebration.

5.1. Human Rights

Draslovka is committed to the protection and advancement of Human Rights wherever we operate and expect our suppliers to do the same. Draslovka abides by international standards, such as the International Labor Organization (ILO) Conventions, UN Declaration of Human Rights, UN Guiding Principles on Business and Human rights, Organization for Economic Co-operation and Development, and the International Bill of Human Rights. Draslovka will not tolerate the use of child or forced labor, slavery, or human trafficking in any of our global operations and facilities, including those operated by suppliers, or in our suppliers' operations.

Guidance for Suppliers:

- Suppliers must abide by all applicable international and national labor laws.
- Total working hours must be in agreement and consistent with Draslovka expectations and within the allowable limit under applicable law.
- Suppliers must comply with legal minimum wage laws and regulations, and overtime hours must be paid at the legally mandated premium.
- All work must be voluntary and local regulations regarding recording of time and payment must be followed.
- Under no circumstance will child or forced labor, slavery, or human trafficking be tolerated.
- Suppliers should provide training to their employees and management regarding human trafficking, modern slavery, and child labor.
- Suppliers must assure that their employees will not suffer retaliation for reporting or raising employment concerns, should provide a confidential way for workers to raise concerns, and should maintain clear record of employee grievances.
- Suppliers are expected to respect freedom of association of their employees and recognize the right to collective bargaining.

5.2. Health, Safety and Quality

Draslovka wants to create a culture that puts both physical and psychological safety first. We expect our suppliers to provide a safe workplace for their employees in compliance with all applicable laws and regulations, and to do all they can to promote both physical and psychological health and safety every day.

Guidance for Suppliers:

- Suppliers are expected to provide a safe and healthy workplace for their employees in compliance with all applicable laws and regulations.
- Suppliers must appropriately communicate and train their employees on potential workplace and materials hazards and the use of personal protective equipment.
- Suppliers will not retaliate against employees who raise concerns about safety.
- Suppliers are expected to have a health and safety program where safety performance goals and targets are set and measured.
- Suppliers must be willing to share their safety performance and/or safety certifications with Draslovka upon request.
- Suppliers will provide Draslovka with products and services that meet all applicable safety standards and promote the safe use and disposal of their products.
- Suppliers should provide Safety Data Sheets containing all necessary product safety information for all hazardous substances.
- Suppliers will maintain acceptable quality standards, integrate quality practices necessary to ensure the delivery of a product which meets or exceeds the contract requirement, and be willing to share external quality certification with Draslovka.
- Suppliers will immediately report to Draslovka any concerns about product or process safety.
- Suppliers will protect their employees and the public against hazards inherent in their processes and products and during the manufacturing and transportation of their products.

5.3. Inclusion and Diversity

Draslovka believes in the power of inclusion and diversity to produce the best thinking, solutions, and innovations needed to remain competitive and has set ambitious goals to grow the diversity of our workforce. We also recognize the value of leveraging a diverse supplier base – on that represents the global communities we serve – to source the goods and services needed for our operations. Diverse thinking and problem solving is good for business, and we strongly encourage our suppliers to work with small businesses, as well as those owned by minorities, women, and other under-represented groups.

Guidance for Suppliers:

- Suppliers should be committed to creating an inclusive and diverse workplace and supporting diverse-owned businesses including, but not limited to, minority and women owned businesses, veteran-owned businesses, and LGBTQ+ owned businesses.
- Suppliers must comply with all applicable employment non-discrimination laws and require their business partners to adhere to non-discrimination laws.
- Suppliers shall ensure non-discrimination in employment, occupation, and personnel practices. These characteristics commonly include but are not limited to: race, color, sex, religion, political opinion, national extraction, social origin, age, disability, HIV/AIDS status, trade union membership, gender expression, and sexual orientation.

- Suppliers should make reasonable accommodations for all employees' religious observances and practices.
- Suppliers should ensure that all employees are treated equally and with respect. No worker should experience physical, sexual, psychological, or verbal harassment.

6 Environmental Practices

Draslovka understands that our customers – and their customers – are facing a world that demands essential products be produced at a lower cost to the environment. That is why Draslovka focuses on responsible chemistry, and we are asking our suppliers to partner with us. We must work closely with our customers, and suppliers as we develop new, responsible solutions that address global challenges.

Guidance for suppliers:

- Suppliers must comply with all applicable environmental regulations, mandates, and laws in their countries of operation. Additionally, suppliers must ensure that all necessary environmental certifications, permits, and registrations are kept up to date.
- Training should be provided to all relevant parties to ensure knowledge of and compliance with all necessary environmental policies.
- Suppliers should promote the environmentally sound development, manufacture, transport, use, and disposal of their products and technologies in a way that minimizes impact on biodiversity, climate change, and water scarcity.
- Suppliers should consider the use of renewable resources in their supply chains and operations.
- Suppliers should use resources efficiently, minimize scarcity, apply energy-efficient, environmentally friendly technologies, and reduce waste, as well as emissions to air, water, and soil.
- Suppliers are expected to measure their environmental performance, set targets to reduce their impact, transparently report their progress, and be willing to share their progress, as well as copies of their environmental management system certifications with Draslovka upon request.

7 Final Provisions

7.1. Assumption

This Policy applies insofar as it does not contradict local legislation.

7.2. Owner of the Policy

Owner of this Policy is Procurement and Logistics.

7.3. Implementation

This Policy was issued on October 31st, 2022 and shall be effective from December 1st, 2022 (i.e. this is the target date from which the Policy shall be implemented and followed in Mining Solutions Companies).

7.4. Amendments

This Policy does not form part of employee's contract of employment and may be amended at any time.

Annex 1 – Definitions and Abbreviations

In this Policy:

“**Company**” means Covoro Mining Solutions, LLC, (ii) Covoro Mining Solutions Canada Co., (iii) Covoro Mining Solutions Mexicana, S. de R.L. de C.V. or (iv) Draslovka Chile Limitada.

“**Draslovka a.s.**” means Draslovka a.s., with its registered office at Generála Píky 430/26, Dejvice, 160 00 Praha 6, Czech Republic, identification number 11786728, registered in Commercial Registry maintained by Municipal court of Prague, under file B, section 26599.

“**Draslovka Group**” or “**Group**” or “**Draslovka**” means all Group Companies; when this term is used in connection with specific position/function it refers to managers/officers/functions with specific “Group-wide” responsibility, reporting (directly or indirectly) to Group CEO.

“**Mining Solutions Companies**” means (i) Covoro Mining Solutions, LLC, (ii) Covoro Mining Solutions Canada Co., (iii) Covoro Mining Solutions Mexicana, S. de R.L. de C.V. and (iv) Draslovka Chile Limitada and a “**Company**” means any of them. Mining Solutions Companies are part of Draslovka Group.

“**Owner**” means function or department responsible for administration of the Policy or its amendments.

“**Policy**” means this Supplier Code of Conduct.