



Responsible Procurement Policy for Mineral raw material

In connection with the procurement of Mineral raw materials, the Mitsui Kinzoku Group will engage in risk management involving the following.

- Systematic or widespread human rights abuses accompanying the extraction, transport or trade of raw materials.
- Direct or indirect support for illegal non-state armed groups, public or private armed forces
- Bribery or fraudulent indication of places of origin regarding raw materials.
- Failure to pay taxes, fees and mining charges to the government in connection with the extraction and trade of minerals as well as exports thereof from Conflict-Affected and High-Risk Areas (CAHRA).
- Money laundering or funding of terrorists.
- Contribution to conflicts.
- Compliance with national regulations of the country where business operations are conducted and company policies concerning the environment, health, safety and labor.
- Storage, handling and disposal of hazardous chemical substances such as mercury and cyanide.
- Labor problem management.
- Plan for cooperation and coexistence with local communities.
- Business integrity and ethical behavior.

1. Development of a management system

We will establish supply chain and traceability systems for mineral raw materials.

In addition, through appointing a compliance officer, a supply chain officer and a systems officer, we will clarify the responsibilities and authorities for promoting responsible procurement management mineral raw materials.

2. Implementation of education and training

We will continue to plan and implement education and training for all employees involved in the procurement of mineral raw materials.

3. Supply chain due diligence assessment

The Mitsui Kinzoku Group will engage in the procurement raw materials accordance with the processes required by the London Bullion Market Association (LBMA) Responsible Gold Guidance, Responsible Silver Guidance and London Metal Exchange (LME) Joint Due Diligence



Standard. By conducting supply chain due diligence of procured mineral raw materials on an ongoing basis, the Group endeavors to grasp the overall picture of the supply chain and carry out risk assessment effectively.

4. Transaction monitoring and recording

As for the supply chain and risk profiles, we will check for consistency between the obtained information and actual transactions, and retain and manage the records appropriately.

5. Formulation and implementation of a strategy for managing identified risks

When a high-risk item is indicated as a result of risk assessment, we will try to mitigate the risk, and if risk mitigation is impossible, the supply chain officer will immediately terminate the purchase of such raw materials.

6. Communication

We will build and promote a mechanism that enables all employees or external stakeholders to speak anonymously about their concerns on any risk related to the supply chain pertaining to raw materials or any other newly identified risk.

7. Implementation of a third-party audit

We will ensure receipt of audits by a third-party entity conducted in accordance with the Audit Guidance, obtain a third-party guarantee, and report the audit results.

8. Information disclosure

The Mitsui Kinzoku Group will disclose on its website an annual report and a third-party audit report related to the procurement of raw materials in accordance with the processes required by the London Bullion Market Association (LBMA) Responsible Gold Guidance, Responsible Silver Guidance and London Metal Exchange (LME) Joint Due Diligence Standard.

October 2022