

# Policy for Conflict-Affected and High-Risk Areas (CAHRAs)

## Preamble

This Policy for Conflict-Affected and High-Risk Areas (CAHRAs) - hereinafter referred to as "Policy" - is adapted from OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Annex II. It is applicable for the TRIMET group - hereinafter referred to as "TRIMET" - including TRIMET Aluminium SE and TRIMET France SAS. Reference is made to TRIMET's Supplier Code of Conduct and TRIMET's Human Rights Code.

## 1. General:

- a. This Policy confirms TRIMET's commitment to respect Human Rights, avoid contributing to the finance of conflict, and comply with all relevant UN sanctions, resolutions and laws.
- b. We also commit to use our influence - which is extremely limited due to our position in the value chain - to prevent abuses by others through risk-based supply chain Due Diligence, by implementing the OECD five-step framework for responsible supply chains of minerals from Conflict-Affected and High-Risk Areas.
- c. Where we find instances of non-compliance of this Policy, we will investigate these incidents to understand the causes, and we take appropriate action accordingly. TRIMET will seek to work with the supplier to ensure a sustainable corrective and mitigating action plan has been implemented prior to the recommencement of purchases and reserves its right to reconsider its relationship with the supplier. In the absence of a sufficient and evidence-based rectification of the issue identified within the agreed time frame, TRIMET may review the continuity with the supplier and reserves its right to terminate its relationship with the supplier.

## 2. Regarding serious abuses associated with the extraction, transport or trade of minerals:

We will neither tolerate, nor profit from, contribute to, assist or facilitate by any party the commission of:

- Torture, cruel, inhuman and degrading treatment
- Forced or compulsory labour
- The worst forms of Child Labour
- Gross Human Rights violations and abuses such as widespread sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

## 3. Regarding direct or indirect support to non-state armed groups:

We will not tolerate direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals, including, but not limited to, procuring minerals

from, making payments to, or otherwise assisting or equipping non-state armed groups or their affiliates, as identified by UN Security Council resolutions, who:

- Illegally control mine sites, transportation routes, points where minerals are traded and upstream actors in the supply chain; or
- Illegally tax or extort money or minerals at mine sites, along transportation routes or at points where minerals are traded, or from intermediaries, export companies or international Traders.

#### **4. Regarding public or private security forces:**

- a. We recognise that the role of public or private security forces is to maintain the rule of law, safeguard Human Rights, provide security to workers, equipment and facilities, and protect mine sites or transportation routes from interference with legitimate extraction and trade.
- b. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 2, or that act illegally as described in paragraph 3.

#### **5. Regarding Bribery and fraudulent misrepresentation of the origin of minerals:**

We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, or to misrepresent the taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

#### **6. Regarding money laundering and payment of taxes, fees and royalties due to governments:**

- a. We will support and contribute to efforts to eliminate money laundering where we identify a reasonable risk of money laundering resulting from or connected to the extraction, trade, handling, transport or export of minerals, derived from illegal taxation of Extortion.
- b. We support the payment and disclosure of all taxes, fees and royalties due to governments related to mineral extraction, trade and export from Conflict-Affected and High-Risk Areas.