

Supplier code of conduct

Introduction

The Keliber lithium project is an advanced lithium project, located in Kaustinen and Kokkola, Finland. The project aims to be the first European producer of battery-grade lithium hydroxide from its own mined ore reserves, thus contributing towards the green transition by facilitating the electrification of transportation. The Keliber lithium project is being developed by Keliber Oy, a subsidiary of Sibanye-Stillwater, a multinational mining and metals processing Group, with the Finnish Minerals Group, a state-owned company developing the value chain of lithium-ion batteries in Finland, the second largest shareholder.

Keliber lithium project, Keliber Oy and its subsidiary Keliber Technology Oy are hereafter referred to as "Keliber".

Scope

This Supplier code of conduct (hereafter referred to as "Code") sets out the principles for and expectations on our suppliers regarding responsible business conduct.

This Code applies to all Keliber's suppliers and subcontractors. In this document they are referred to as "Suppliers".

Compliance

The principles of this Code are minimum requirements. Suppliers must always fully comply with applicable local, national and international laws, regulations and conventions. Suppliers shall uphold the highest standards of integrity, honesty, and ethical behaviour in all their dealings. If applied local, national or international laws, regulations and conventions are stricter than this Code, they shall be applied.

When doing business with Keliber, we expect our Suppliers to act in compliance with this Code. Where Suppliers use subcontractors or sub-suppliers to provide goods and service to Keliber, it's the responsibility of the Suppliers to make such subcontractors/sub-suppliers aware of this Code and to apply the corresponding principles for the evaluation and selection of subcontractors/sub-suppliers.

1. Labour and human rights

1.1 Forced labour and child labour

Suppliers must not engage in or support any form of forced, involuntary labour or child labour. Suppliers must not employ individuals below legal working age as stipulated by relevant laws or conventions. The rights of children to education and development must be upheld.

Suppliers should implement appropriate mechanisms to verify the age of employees and ensure that no underaged individuals are employed.

1.2 Fair wages and working hours

Suppliers must comply with applicable laws, collective agreements, and industry standards regarding wages and compensation, working hours, holidays, etc.

Suppliers should:

- Provide employees with fair wages that meet or exceed legal minimum wage requirements and allow for a decent standard of living
- Compensate employees fairly for any overtime work in accordance with local labour laws and regulations
- Overtime should be voluntary and not exceed legal limits
- Adhere to legal limitations on working hours and ensure employees are not required to work excessively long hours that compromise their health, safety and work-life balance
- Provide employees with regular breaks and rest periods to ensure their well-being and prevent fatigue
- Ensure that wage and compensation practices are free from discrimination

1.3 Non-discrimination and equal opportunity

Suppliers must treat all individuals with respect and dignity, regardless of their race, gender, religion, age, disability, marital status, sexual orientation, or any other characteristic protected by law. Equal employment opportunities should be provided to all, and discrimination of any kind should not be tolerated.

1.4 Diversity

Suppliers should promote diversity within its company and adopt inclusive hiring practices that encourages diversity at all levels of their workforce, including leadership positions.

1.5 Health and safety

Suppliers should:

- Provide a safe and healthy working environment for all employees, including both physical and psychosocial well-being
- Conduct regular assessments to identify workplace hazards and implement measures to mitigate or eliminate them
- Develop and implement risk management plans to address potential safety risks, including emergency response procedures
- Provide employees with adequate training and education on health and safety practices, including the proper use of safety equipment
- Provide appropriate personal protective equipment to employees, such as helmets, gloves, masks, and goggles, etc. based on the specific hazards of their work
- Establish clear emergency procedures, including evacuation plans, fire drills, and communication protocols
- Establish mechanisms for employees to report health and safety concerns without fear of retaliation
- Conduct regular health and safety audits to ensure compliance with established standards and continuous improvement

1.6 Freedom of association and collective bargaining

Suppliers should respect employees' rights to join trade unions or other employee associations and engage in collective bargaining.

1.7 Ethical treatment and respect

Suppliers should promote a culture of respect and ethical treatment. This includes discouraging any form of physical, verbal, or psychological abuse, and ensuring that disciplinary measures are fair and proportionate.

2. Ethical business practices

2.1 Anti-corruption and bribery

Keliber has zero tolerance for all corruption and bribery.

Suppliers may not offer, give, solicit or accept bribes, kickbacks, or any form of corrupt payments. This includes gifts, favours, or payments intended to influence business decisions or gain unfair advantages.

2.2 Money laundering

All forms of money laundering are prohibited, and legislation introduced to combat money laundering must be complied with. Suppliers must have adequate procedures for preventing any financial crime such as fraud, extortion, money laundering, and financing for illegal or unauthorised purposes.

2.3 Fair competition

Suppliers should compete fairly and ethically in the marketplace. Collusion, price-fixing, bid-rigging and any form of anti-competitive behaviour are strictly prohibited.

2.4 Conflict of interest

Suppliers should avoid situations where personal, family, or financial interests could conflict with their responsibilities to provide unbiased products or services.

If such a conflict of interest arises, the Supplier shall take appropriate measures to eliminate the conflict of interest.

2.5 Political contributions

Suppliers must observe neutrality or be transparent in their support for political parties and political representatives.

2.6 Intellectual property rights

Suppliers must respect the intellectual property rights of others and ensure the proper use, protection and licensing of intellectual property rights.

2.7 Whistleblower protection

Suppliers shall have a clear and comprehensive whistleblower policy that outlines how their employees can report concerns like unethical behaviour, corruption, etc. internally. Suppliers must commit to not engaging in any form of retaliation against employees who make good-faith reports or cooperations in investigations. Suppliers shall have a confidential and secure reporting channel for employees to report their concerns, including an anonymous option. Suppliers shall outline the steps that will be taken to investigate, address and correct reported concerns.

2.8 Relationships

Suppliers should treat their own suppliers, subcontractors, sub-suppliers, and business partners with fairness, honesty, and respect, reflecting the same values you expect from them.

3. Environmental responsibility

Suppliers must adhere to all applicable local, national and international environmental laws, regulations, and standards.

Supplier should:

- Strive to minimise resource consumption and waste generation throughout their operations
- Take measures to prevent pollution, including proper disposal of waste and hazardous materials, and minimising emissions to air, water, and soil
- Implement energy efficient practices and technologies to reduce energy consumption and greenhouse gas emissions
- Manage water resources responsibly, minimising water consumption and implementing measures to prevent water pollution
- Use sustainable packaging materials and practices that minimise waste and environmental impact
- Encourage to explore and adopt renewable energy sources as part of their operations
- Should prioritise sourcing materials from suppliers that adhere to environmentally responsible practices
- Consider the environmental impact of their products throughout the entire life cycle, from production to disposal
- Take measures to reduce their carbon footprint, including transportation emissions and energy use
- Provide transparent information about their environmental performance, practices and initiatives upon request

4. Supply chain responsibility

4.1 Transparency and traceability

Suppliers shall provide accurate and transparent information about their supply chain, including the origin of materials, components, and products used in their offering. Suppliers shall strive to be able to trace the flow of materials throughout their supply chain.

4.2 Ethical sourcing and labour practices

Suppliers should ensure that the materials and components used in their products are sourced responsibly and do not involve any violations of human rights, forced labour, child labour, or unethical practices.

4.3 Subcontracting and outsourcing

Suppliers must not subcontract work or outsource processes without prior consent from Keliber. If subcontracting is permitted, Suppliers are responsible for ensuring that subcontractors adhere to the same ethical, social and environmental standards as required by this Code.

4.4 Conflict minerals

Suppliers should commit to not using conflict minerals (minerals sourced from regions where their extraction, trade, and profit are associated with armed conflict, human rights abuses, or environmental harm) in their products. This includes minerals such as tin, tantalum, tungsten and gold, known as the 3TG minerals.

Suppliers should provide a written declaration confirming that the minerals used in their products are conflict-free upon request.

Suppliers should conduct due diligence to trace the source of minerals and other relevant materials in their supply chain. This involves identifying smelters and refiners and verify their compliance with conflict-free sourcing standards.

4.5 Social responsibility

Suppliers should actively contribute to the social well-being of the communities they operate in and ensure that their business practices do not harm the local communities.

4.6 Reporting

Suppliers should establish reporting mechanisms to track progress of responsible sourcing efforts and share information regarding these efforts to Keliber upon request.

5. Risk management

5.1 Risk identification

Suppliers should identify potential risks within their operations, supply chain, and business practices that could have adverse impacts on Keliber.

5.2 Risk assessment

Suppliers should assess the severity and likelihood of identified risks to determine their potential impact and prioritise them accordingly.

5.3 Mitigation strategies

Suppliers must develop and implement strategies to mitigate identified risks. These strategies should aim to prevent or minimise the impact of risks both on Keliber and the Suppliers.

5.4 Business continuity planning

Suppliers should establish plans to ensure the continuity of their operations in the event of disruptions caused by risks such as natural disasters, geopolitical issues, or other unforeseen events.

5.5 Supply chain resilience

Suppliers should work towards building a resilient supply chain that can adapt to changes, disruptions, and unexpected events.

5.6 Reporting

Suppliers shall engage in discussions regarding identified risks with Keliber and communicate mitigation strategies for handling or minimising the identified risks.

6. Data privacy and security

6.1 Data handling and protection

Suppliers must handle and protect all data shared by Keliber in accordance with applicable data protection laws. Data should be collected, processed, and stored only for the purposes specified in the business relationship and not for any other purpose without explicit consent.

Suppliers should conduct regular risk assessments to identify vulnerabilities and potential weaknesses in their digital infrastructure.

6.2 Confidentiality

Suppliers should maintain strict confidentiality of Keliber's proprietary, sensitive, or personal data.

When appropriate, Suppliers may be asked to enter into a separate confidentiality agreement with Keliber.

6.3 Cybersecurity

Suppliers must implement robust cybersecurity measures to protect against cyber threats, including hacking, malware, and unauthorised access..

7. Continuous improvement

Suppliers are encouraged to continuously improve their ethical, social and environmental practices and to engage in ongoing dialogue with Keliber about such improvements.

8. Consequences of non-compliance

Suppliers shall have an adequate process in place to ensure own compliance – and preferably throughout the supply chain – with this Code, relevant laws, legislation and other rules. Compliance may be subject to assessment and Keliber and any third party appointed by Keliber shall have the right to assess Suppliers compliance with this Code. Upon request, Suppliers shall participate in reviews and provide Keliber with information and data to verify compliance with this Code.

Failure to comply with this Code may result in the suspension or termination of the business relationship. Where it is possible and appropriate to remedy a breach, Keliber may instead choose to allow the Suppliers an option to cure such a breach. Keliber, however, reserves the right to take appropriate actions to address violations.

9. Reporting of concerns

Keliber expects the Suppliers to promptly report any concerns of non-conformities of this Code to Keliber, including, if possible, violations by Suppliers' subcontractors or sub-suppliers.

The concerns shall be raised directly to their business counterpart/contact person at Keliber.

10. Acknowledgment

By entering into a business relationship with Keliber, Suppliers acknowledge that they have read, understood and agreed to comply with this Code.