

Responsible global supply chain
of minerals from conflict-affected
and high risk areas



Umicore is a global materials technology and recycling group that purchases and recycles minerals and metals for use in a wide variety of products and technologies.

Umicore is committed to conducting its business, through its employees, directors, officers and agents, in compliance with applicable laws and overall in an honest and ethical manner. Umicore believes that a commitment to honesty, ethics and integrity is an essential foundation that builds trust with clients, business partners, shareholders and the community at large in which it operates.

As part of the Umicore Way, Umicore has accordingly adopted a set of policies and charters to ensure its activities are conducted in line with the above principles. These include the Umicore Code of Conduct, Human Rights Policy and Sustainable Procurement Charter.

While the company has no industrial, mining or trading operations in conflict-affected and high-risk areas, minerals or metals purchased by Umicore in the course of its activities may in certain cases originate from such areas.

Considering the human rights and other risks that may be connected to the extraction, trading, handling and exporting of minerals from conflict-affected and high-risk areas, and our commitment to support and contribute to the respect of human rights and ethics in business, Umicore adopts this specific policy on responsible sourcing of minerals from conflict-affected and high-risk areas and commits to submit it to its suppliers to serve as a common reference for conflict-sensitive sourcing practices and to promote risk awareness. Umicore has based this policy on the currently existing OECD Guidelines on the matter.

Umicore does not wish to take part in any action that contributes to the financing of conflict and subscribes to the relevant United Nations sanctions resolutions or, where applicable, the domestic laws implementing such resolutions.

When sourcing minerals from, conflict-affected and high-risk areas, Umicore will do so in line with its Group Policies and specifically review the existence of the below and when identified will neither tolerate nor profit from, contribute to, assist with or facilitate the commission by any party of:

- any form of torture, cruel, inhuman and degrading treatment;
- any form of forced or compulsory labor;
- any form of child labor;
- other gross human rights violations and abuses such as sexual violence;
- war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

We will furthermore not give nor tolerate any direct or indirect support to non-state armed groups or to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

When we identify a reasonable risk that a supplier is sourcing from, or linked to, a party committing serious abuses as set forth above, we will suspend or discontinue our relation with such supplier.

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

We will support efforts, or take steps to contribute to the effective elimination of 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 or extortion at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

We request that our suppliers comply with this policy when extracting, sourcing, transporting, trading, handling or exporting minerals from conflict-affected and high-risk areas. We are willing, in accordance with our position in the supply chain, to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate risks. In case we have reasonable belief that a supplier fails to comply with this policy, we will suspend or discontinue the dubious supply.

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