



Supplier Code of Conduct

At Kenmare, our actions are informed by our guiding principles: we care, we grow, we excel as well as our Company purpose: transforming resources into opportunity for all. We recognise that our supply chain is an essential part of our business and that our suppliers, through the goods and services they deliver in support of our operations, create environmental, social and governance impacts that Kenmare is indirectly responsible for. It is Kenmare’s vision for our entire supply chain to share our commitment to sustainable development.

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1. Introduction

This Supplier Code of Conduct (the “Code”) of Kenmare Resources plc and its subsidiaries (together “Kenmare”) outlines principles, standards and goals for planning, implementation and monitoring of the supply of materials, services, equipment and technical resources to the Moma Mine.

The Code principles are applied to suppliers, vendors, contractors, consultants, agents and other providers of goods and services to the Moma Mine (referred to in this Code as “Suppliers”). We expect all our Suppliers to conduct business responsibly, with integrity and transparency. This Code sets out the standards we expect of our Suppliers and we will work with them to meet these standards.



We ask that Suppliers apply these requirements to their own suppliers, contract labour providers, and sub-contractors with whom they work to supply goods and services to Kenmare. Where Kenmare has a contractual relationship with a Supplier, this Code supplements, and does not replace, any contractual terms.

Kenmare will work proactively with Suppliers to continuously improve and embed positive practices within the supply chain process. Our core values are 'ICARE': Integrity, Commitment, Accountability, Respect, and Excellence. All employees and suppliers are expected to uphold these values.

The Code was developed to guide ethical and professional conduct, to prevent misconduct, ensuring alignment with the Company's standards as well as helping Suppliers understand Kenmare's expectations regarding sustainable development. Suppliers may be audited or required by Kenmare to provide information to demonstrate compliance with this Code.

As part of the sustainability due diligence process, suppliers are asked to confirm adherence to this Code. Additionally, Suppliers will be asked to complete surveys with Kroll, Nexia and EcoVadis, to help Kenmare assess the sustainability related risks that are associated with new or existing suppliers.

2. Scope

2.1. Business ethics and anti-bribery and corruption

Suppliers shall conduct their business ethically, with integrity. Suppliers are expected to comply with all applicable laws in their contractual relations with Kenmare. Suppliers shall ensure that their operations, products, and services comply with all national and other applicable laws including, but not limited to those relating to corruption, bribery and money laundering.

Suppliers are expected to:

- Demonstrate zero tolerance for corruption, bribery, money laundering, facilitation payments, and other illegal activities
- Maintain and communicate suitable policies which make it clear that employees or agents shall not offer, give or accept any bribe or improper advantage
- Disclose any personal relationships, economic interest or other ties which their businesses have to any Kenmare employee or contractor
- Commit to transparency and accountability in their businesses
- Ensure security throughout their supply chain and comply with processes that promote the integrity of goods
- Inform Kenmare in a timely way about any financial, legal and other business difficulties that may affect contractual agreements with Kenmare
- Use systems that ensure security of customer data and confidentiality
- Collect and use personal information carefully and in compliance with relevant data protection and privacy laws
- Respect intellectual property rights of third parties
- Respect the integrity of the Kenmare IT system through appropriate use of email and other communication methods
- Maintain accurate records of their activities and performance that clearly demonstrate compliance with all applicable standards, regulations and Kenmare policies

2.2. Employment, labour standards and human rights

At Kenmare, we are fully committed to respecting the human rights of all our stakeholders within our sphere of influence. We support the International Bill of Human Rights, including the UN Declaration of Human Rights; the International Labour Organisation's Fundamental Conventions and Declaration on Fundamental Principles and Rights at Work; and Part I, Chapter IV (Human Rights) of the OECD Guidelines for Multinational Enterprises. We expect our Suppliers to do the same.

All people should be treated with dignity, fairness and respect, and shall not be forced to work against their will. Suppliers are required to ensure full compliance with all applicable employment, labour and human rights laws and any relevant industry standards.

Suppliers are expected to:

- Support the principles set forth in the international standards outlined above
- Respect the human rights of their employees and members of our host communities
- Have zero tolerance of and take proactive measures to prevent child or forced labour
- Provide employees and other workers with a safe working environment
- Provide a working environment for their employees where everyone is respected, free from any form of harassment and bullying including sexual harassment
- Treat all their employees and business partners equally, regardless of gender, gender identity, civil status, family status, sexual orientation, religious belief, age, disability, race or ethnicity
- Ensure any security measures are consistent with international standards, including the Voluntary Principles on Security and Human Rights
- Ensure that all employees have the legal right to work and assist its employees to establish the legal right to work and valid immigration status, where applicable
- Respect the rights of employees to organise and join, or refrain from joining, worker organisations and to bargain collectively
- Develop and implement mechanisms for resolving industrial disputes, including employee grievances, and ensure effective communication with employees and their representatives
- Apply fair and appropriate terms of employment, including, but not limited to, working hours and compensation, ensuring all their employees earn at least the minimum wage in the supplier's country of operation
- Ensure that accommodation, where provided, is clean and safe and meets the basic needs of employees

In many countries, national laws set standards that are at least as high as those set out in human rights standards. Where that is the case, national laws shall be followed. However, where national laws do not provide a suitable level of protection, human rights standards shall be observed. If a conflict between national law and international human rights standards occurs, we expect our Suppliers to respect national law while endeavouring to protect human rights.

2.3. Health and safety

Suppliers will ensure full compliance with the relevant health and safety laws, regulations, and codes to ensure the safety and health of their employees and others. Suppliers are also required to comply with Kenmare policies and procedures when working at the Moma Mine. In addition, we expect that Suppliers:

- Either have an appropriate Health and Safety Policy for employees and subcontractors ensuring health and safety with target of zero harm to health, or fully comply with Kenmare's Health and Safety Policy
- Adopt the zero-harm principle and strive to avoid and to take all practical and reasonable measures to eliminate fatalities, work-related injuries and health impairment of their employees
- Demonstrate visible and active safety leadership at all management levels, including clear accountability for health and safety performance.
- Identify, assess and effectively manage health and safety risks to employees, third-party service providers, and local communities
- Provide their employees, including new, reassigned or temporary workers, with regular and recorded health and safety training and Personal Protective Equipment, as required
- Ensure, where relevant, that emergency preparedness plans and procedures are developed and maintained, as well as made widely available for training purposes
- Promptly report any emergencies that may impact on Kenmare's activities
- Conduct formal incident investigations and implement corrective and preventive actions.
- Participate in all safety engagement meetings, organised by Kenmare
- Facilitate reasonable health and safety inspections by Kenmare and provide Kenmare with reasonable health and safety performance information when requested
- Suppliers are strongly encouraged to collaborate with Kenmare to identify opportunities to improve safety and minimise health impacts

For onsite Suppliers:

- Encourage active worker participation in health and safety matters through Visible Felt Leadership, toolbox talks, and consultation mechanisms
- Provide all workers with the authority and obligation to stop work if they believe conditions are unsafe, without fear of retaliation
- Ensure employees are fit for work and not under the influence of alcohol, drugs or other substances that may impair safe performance
- Identify and control occupational health hazards, including exposure to dust, noise, vibration, chemicals, radiation, and biological agents
- Implement health surveillance and medical monitoring programmes where employees are exposed to health risks
- Manage fatigue through appropriate working hour controls and rest periods.

2.4. Environmental management

Suppliers shall commit to protecting the environment and carry out their work for Kenmare in an environmentally responsible and sustainable manner.

Suppliers are required to:

- Support a precautionary approach to environmental challenges
- Either have an environmental policy which details their commitment to protecting the environment and carrying out their work for Kenmare in an environmentally responsible and sustainable manner, or committing to complying with Kenmare's Environmental and Climate Policies
- Comply with applicable environmental legislative requirements and relevant guidelines when providing goods or services to Kenmare
- Collaborate with Kenmare to identify opportunities for environmental improvement while paying particular attention to reduce energy consumption; greenhouse gas emissions; raw water consumption; use of hazardous materials; air emissions; waste management; and conservation of biodiversity

- Observe Kenmare policies and procedures on environmental protection while undertaking work for Kenmare, including responsible waste management, responsible remediation of spillages or releases of products that have an impact on the environment or on third parties, incidents prevention and reporting, when they occur.

2.5. Community Engagement

Suppliers are requested to develop strong and lasting relationships with local host communities based on respect, a desire to learn and mutual benefit.

Suppliers are requested to:

- Assist Kenmare in delivering economic, social, and educational value to local communities
- Prioritise local communities for employment and business opportunities where possible
- Respect the cultural heritage and traditions of our host communities and resolve issues using respect, trust, and dialogue.

3. Code Implementation

Successful implementation is expected to result in risk reduction for Kenmare and for the Supplier as well as good sustainable development awareness and performance throughout the value chain. To that end, when selecting Suppliers through formal tender process, Kenmare will give a higher scoring, in accordance with defined evaluation criteria, to those suppliers that demonstrate commitment to sustainable development. Kenmare will also take into consideration the track record of the supplier. We encourage suppliers to ensure that their business practices comply with the principles of this Code.

Suppliers are expected to cooperate with Kenmare to allow it or any authorised third party to conduct audits to verify compliance with this Code or other required certifications. In the event deficiencies are identified, the Supplier is expected to take the steps necessary within an acceptable timeframe to correct any deficiency to Kenmare's satisfaction. Where suppliers are found to have contravened the requirements set out in this Code, Kenmare reserves any right it might have to terminate any associated agreement or business relationship.

Suppliers are encouraged to:

- Implement this Code within their organisation
- Ensure that this Code is applied downstream in their supply chain. Suppliers shall ensure that their agents, contractors, and suppliers are aware of this Code and its impact
- Maintain effective management systems that are based on sound business and scientific principles, including target setting, regular performance assessment and continuous improvement. When engaging with Suppliers, Kenmare will take into consideration the track record of the supplier. We encourage suppliers to ensure that their business practices comply with the principles of this Code.

For further detail, on Kenmare's Sustainability policies visit www.kenmareresources.com to view our: Environmental, Climate and Energy, Health & Safety, Human Rights, Business Ethics, Employment, Diversity & Inclusion, Freedom of Association, and Stakeholder Engagement Policies.

4. Reporting non-compliance and governance

4.1. Reporting non-compliance

Suppliers shall be transparent about compliance with the standards and expectations set out in this Code.

Suppliers should immediately report any concerns about compliance with legal requirements by Kenmare or others or any aspect of this Code, to their designated point of contact or anonymously through our whistleblowing line operated by a third party called Safecall.

Safecall can be contacted via e-mail: kenmare@safecall.co.uk or via the web: www.safecall.co.uk/report, via the phone:



Safecall is a global 24/7 whistleblowing hotline that is focused on safely allowing ethical transparency between a company, its employees, contractors and suppliers. Safecall provides an independent external reporting line where employees or other stakeholders can raise concerns, in Portuguese or English, about Kenmare and be assured that it will be investigated. Safecall summarise the content of the call and send it (to Kenmare's Internal Auditor with a copy to our General Counsel), or in certain circumstances to the Company Secretary, who will then consider the appropriate next steps. The Safecall service is available 24 hours a day, 365 days a year.

4.2. Governance

The Sustainability Committee oversees the Company's compliance with the principles of this Code and monitors Kenmare's supply chain's compliance with this Code. This Code is subject to biannual review by the Committee to consider if it remains appropriate and consistent with applicable standards and practices, and to recommend any changes it considers desirable to the Board for approval.

Kenmare's management team will conduct regular performance reviews against the principles of the Code, as well as internal policies and procedures, to ensure that we are fulfilling the commitments set out in this Code.

5. Contacts

We welcome any queries from our stakeholders. Questions regarding the content and application of this Code can be forwarded to our team in any convenient form, including by phone or via e-mail. Our contact details can be found in the Contacts section on Kenmare's official website.

This policy was reviewed and approved by the Board of Kenmare Resources plc and is signed by Tom Hickey, Managing Director on behalf of the Board of Kenmare Resources plc.

Tom Hickey
Managing Director
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Document revision control

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