Supplier Code of Conduct

Effective: February 2026

Jervois

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Jervois

1. Introduction

Jervois is a leading global supplier of responsibly sourced and produced cobalt and nickel materials and provides secure, reliable and traceable supply for our customers.

Three core values of responsibility, integrity and accountability provide the foundation for how we operate, collaborate, engage and unite in our work. We aim to make a positive, meaningful difference in the lives of our people, our partners, our host communities and countries.

Jervois values set the standard for every decision we make. This Supplier Code of Conduct ("Code") applies to all suppliers of goods and/or services, including their parent companies, subsidiaries, and any affiliated entities ("Suppliers"). It sets forth the expectations we hold for all parties in our supply chain.

Jervois will work only with Suppliers whose conduct aligns with our core values and who at a minimum, meet this Code's requirements.

Compliance with this Code is a condition for entering into and continuing a contractual relationship with Jervois. We reserve the right to terminate a contract in the case of a violation or breach of this policy.

2. Implementation & Compliance

Suppliers must:

- Appoint a senior representative to oversee compliance with this Code;
- Keep accurate, complete, and legally compliant records;
- Maintain training programs to support policy implementation, legal compliance and continuous improvement;
- Openly share concerns, data and incidents related to compliance with this Code, including updates on corrective actions; and
- Provide a grievance mechanism that allows employees, suppliers, subcontractors and other stakeholders to report concerns confidentially and without fear of retaliation.

3. Monitoring

Jervois reserves the right to monitor and audit Supplier compliance with this Code. This may include assessments, on-site audits, and requests for information.

Jervois acknowledges that our Suppliers have varying capacities and resources. Where appropriate, we will take steps to strengthen our Suppliers' ability to meet the requirements set out in this Supplier Code of Conduct.

If actual or potential risks or violations are identified, Jervois may request the joint development of a corrective action plan. Suppliers are expected to: keep Jervois informed about the status of corrective actions; cooperate openly and transparently; and take appropriate steps to implement corrective measures, including risk management plans where necessary.

Failure to cooperate or comply may lead to a review of the business relationship and could result in termination.

4. International Frameworks

Jervois practices align with these international principles and guidelines. We expect our Suppliers to align their practices with these international standards:

- *United Nations International Bill of Human Rights*
- *International Labour Organization Declaration on Fundamental Principles and Rights at Work*
- *OECD Guidelines for Multinational Enterprises*
- *United Nations Guiding Principles on Business and Human Rights.*

We comply with all applicable embargos, sanctions and local laws.

5. Health & Safety

Suppliers must provide a safe and healthy working environment by:

- Complying with all applicable health and safety laws and regulations;
- Identifying and addressing occupational health and safety risks through effective procedures;
- Taking proactive measures to prevent accidents and injury and ensuring readiness to respond to emergencies;
- Ensuring proper use of personal protective equipment (PPE), and maintenance of machinery;
- Providing adequate health and safety training to employees and subcontractors;
- Promptly reporting any workplace accidents, injuries, unsafe conditions, incidents, or property damage caused by their people while working with Jervois;

- Strictly prohibiting and monitoring the use of alcohol and drugs in the workplace; and
- Prohibiting weapons on Jervois' premises or the carry of weapons while performing work for Jervois.

Suppliers are expected to foster a culture of safety to protect all workers and uphold Jervois' commitment to ethical business practices.

6. Environment

Jervois is committed to ensuring excellence in environmental sustainability and expects its Suppliers to:

- Comply with all applicable environmental laws;
- Identify, assess, and manage environmental risks and impacts arising from their activities, in accordance with all applicable laws;
- Reduce their environmental impact by putting in place effective measures to manage and minimize waste, pollution, hazardous materials, greenhouse gases, and other emissions;
- Continuously improve the efficiency of energy, water, and resource consumption; and
- Strive to implement recycling and reuse processes.

Jervois encourages its Suppliers to determine their Greenhouse Gas (GHG) Emissions. In some cases, we may request our Suppliers to report their Scope 1, 2, and 3 emissions and establish GHG reduction targets and reduction plans.

7. Human & Labor Rights

Our Suppliers are expected to treat employees, community members, and other stakeholders with dignity and respect.

We expect our Suppliers to respect all human rights, especially those of indigenous people, children, people with disabilities, and other vulnerable groups in the communities where we work. We encourage our Suppliers to hire, subcontract, and buy from local communities whenever possible.

Our suppliers must comply with applicable labor laws and agreements, including the following:

- **Child Labor:** Jervois adheres to requirements of the ILO, OECD and national law and strictly prohibits anyone under the age of 18 years from engaging in hazardous work on its premises. In addition:
  - *Suppliers of non-mineral goods and services* must only employ individuals who meet the strictest minimum age standard — whether it's the local legal minimum, the end of compulsory schooling, or 15 years old.
  - *Suppliers of raw minerals and related services* must follow the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from*

Conflict-Affected and High-Risk Areas (”OECD Guidance”) (Section 11). They must not engage in or tolerate the use of child labor, including the worst forms of child labor, as defined by the ILO and OECD.

- **Forced Labor:** All forms of forced or compulsory labor are prohibited, including debt bondage, involuntary prison labor, human trafficking, and any form of coercion.
- **Discrimination and Harassment:** Suppliers must promote a workplace free from discrimination, harassment, or abuse based on age, race, colour, religion, nationality, gender, sexual orientation, disability, or any other legally protected characteristic.
- **Working Hours and Compensation:** Suppliers must follow applicable laws on working hours, leave, wages, and benefits, paying fair wages and ensure that overtime is voluntary and properly compensated.
- **Freedom of Association:** Suppliers must respect employees’ rights to freely associate, join unions, and engage in collective bargaining without fear of retaliation or harassment.
- **Workplace harassment:** Suppliers must provide a safe workplace free from harassment, intimidation, or offensive behaviour that makes the workplace uncomfortable or unsafe. This includes hurtful words, jokes, gestures, unwanted touching, actions meant to bully or threaten others or any forms of sexual coercion.

8. Business Ethics

Suppliers are expected to conduct their business with honesty and integrity and required to follow the applicable laws. Jervois’ Code of Ethics and Business Conduct provide details on expectations of our Suppliers concerning ethical business practices.

Among these include:

- **Anti-Corruption:** Prohibition of all forms of bribery, corruption, and improper payments, including unofficial facilitation payments, kickbacks, or any benefit meant to gain an unfair advantage.
- **Fair Competition:** Compliance with all competition laws and fair business practices. Suppliers must not engage in practices such as price-fixing, market division, or bid rigging.
- **Data Protection:** Suppliers must protect all personal information collected, processed, or stored in compliance with applicable data protection laws. They must implement measures to ensure security and

confidentiality of data and prevent unauthorized access, loss, or disclosure.

- **Trade Compliance:** Suppliers must strictly adhere to export, import and economic sanctions, and international trade laws. This includes ensuring that products, services, or technologies supplied to Jervois do not violate embargoes or trade restrictions imposed by relevant jurisdictions.

9. Confidentiality & Intellectual Property Rights

Suppliers must keep confidential business, technical, and sensitive information received from and about Jervois private. They must also protect and respect the intellectual property of Jervois and any third parties.

10. Conflicts of Interest

A conflict of interest happens when a Supplier, a Supplier's employee or someone connected to them has a direct or indirect personal, professional or financial interest that affect, or even appears to affect, their decisions and ability to act with impartiality, loyalty and in the best interest of Jervois.

Examples include but are not limited to:

- Doing business with Jervois when there is a personal connection or benefit;
- Asking Jervois employees for personal favours; and
- Having a financial interest in a company that works with Jervois without telling us.

Suppliers must inform their main point of contact with Jervois' right away if there's a real or possible conflict of interest. They should report any outside jobs, financial ties, or relationships that could affect their fairness or loyalty to Jervois. Suppliers and/or their personnel and subcontractors will not use Jervois' resources or information for personal or unrelated business gain.

Transparency is essential. A conflict of interest won't automatically disqualify a Supplier from working with Jervois, but it must be disclosed and properly managed with Jervois' involvement. Failing to report a conflict may result in termination of the Supplier relationship.

11. Responsible Sourcing of Minerals

Suppliers of cobalt, nickel or other raw mineral materials are expected to comply with our relevant Supply Chain Policies and align with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (”OECD Guidance”).

Suppliers must:

- Set up management and control systems, including traceability processes to track raw materials from the mine to delivery, and ensure these materials are not connected to armed conflict or human rights abuses;
- Regularly assess, review, and share records showing compliance with OECD Guidance and the requirements of this Supplier Code of Conduct;
- Monitor for risks in their supply chains and promptly inform Jervois of any concerns or red flags related to compliance;
- Keep Jervois updated on the progress of any corrective actions being taken.

12. Reporting Possible or Suspected Violations

If Suppliers and/or their employees or subcontractors see or suspect any behavior that breaks this Supplier Code or an applicable law, they must report it to Jervois right away.

Reports can be made to your local Jervois contact, the contacts below, or anonymously using our 24/7 SpeakUp Platform. Where allowed by law, all information will be kept confidential. Suppliers must not retaliate against their employees or subcontractors for speaking up.

Access the SpeakUp Platform via the following link or QR code: **https://jervois.speakup.report/global**

13. In Case of Doubts

If you are faced with a difficult decision, consider whether you would feel comfortable if your choice became public knowledge.

If you think your decision might seem improper legally or ethically, if you’re unsure about what to do, or if you want to discuss how to apply this Supplier Code of Conduct, please contact us.

- **Jervois Finland:** jervoisfinland@jervoisglobal.com
- **Jervois Brasil**: esg.brasil@jervoisglobal.com
- **Jervois Corporate:** compliance@jervoisglobal.com