

Hibi Kyodo Smelting Co., Ltd.

Responsible Supply Chains Compliance Report

In accordance with the responsible supply chains, which align with Risk Readiness Assessment Criteria prepared by RMI and the Copper Mark, Mitsui Mining & Smelting Co., Ltd. (hereinafter “Mitsui Kinzoku”) and Hibi Kyodo Smelting Co., Ltd. (hereinafter “Hibi Kyodo Smelting”) conduct activities based on the five-step framework as defined in Annex I of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" (hereinafter “OECD Guidance”). The following is an annual report on the activities.

Assessment result of management system

- Period of assessment: From October 1, 2023 to September 30, 2024
- Scope of assessment: Suppliers of copper raw materials

Result of assessment: In the internal audit, the management system was confirmed to be functioning effectively, although minor improvements were recognized as desirable. We will promptly address the required improvements.

Step 1: Management System

(1) Supply Chain Policy

Hibi Kyodo Smelting is a joint smelting facility of Mitsui Kinzoku, Nittetsu Mining Co., Ltd. (hereinafter “Nittetsu Mining”) and Furukawa Metals & Resources Co., Ltd. (hereinafter “Furukawa Metals & Resources”). PAN PACIFIC COPPER (hereinafter “PPC”), which was established based on an alliance between Mitsui Kinzoku and JX Metals Corporation (hereinafter “JX Metals”), is mainly in charge of the procurement of raw materials.

Nittetsu Mining and Furukawa Metals & Resources procure raw materials in accordance with the Responsible Procurement Policy for Mineral raw material set forth by Hibi Kyodo Smelting.

PPC procures copper raw materials in accordance with the Copper Supply Chain Policy set forth by JX Metals.

Both policies comply with the model in Annex II of the OECD Guidance in paragraphs (1) through (9) below. Mitsui Kinzoku supports these initiatives and aims to achieve ongoing improvements. The policies will be updated as needed.

(1) Address systematic or widespread human rights violations related to the extraction, transportation,

and trade of mineral resources.

- (2) Responding to direct or indirect support for non-governmental groups
- (3) Addressing bribery and misrepresentation of origin.
- (4) Addressing non-compliance with tax, fees, and royalty obligations to governments related to mineral extraction, trade, and exports from conflict-affected and high-risk areas (CAHRAs).
- (5) Preventing money laundering and funding of terrorists.
- (6) Responding to complicity in conflicts.
- (7) Complying with national regulations and company policies with regard to the environment, health, safety, and labor in countries where we conduct business.
- (8) Promoting business integrity and ethical conduct, and supporting the implementation of relevant initiatives such as the Extractive Industries Transparency Initiative (EITI).
- (9) Managing labor issues including compensation, working hours, collective bargaining, discrimination, diversity, labor disputes, and ensuring worker safety.

(2) Internal management

Mitsui Kinzoku is building an internal control system, and is clearly defining governance, roles and responsibilities, communications, internal audits and senior-level management reviews in line with this policy.

The compliance officer is in charge of the following roles and responsibilities:

1. Formulating and exercising due diligence and the organizational management strategy
2. Approving new, high-risk suppliers and making final decisions on suspending trading. The compliance officer is a member of the Board of Directors of Mitsui Kinzoku and possesses a deep understanding of the due diligence program.

The supply chain officer is in charge of the following roles and responsibilities regarding the division of roles for the management of the due diligence team.

1. Formulate a responsible minerals sourcing policy
2. Approve a manual and related regulations
3. Make decisions to start, continue or suspend business transactions with a specific supplier should high risks be identified
4. Report to the compliance officer to garner approval to start, continue or suspend business relationships.

The system manager who is under the direct supervision of the supply chain officer is assigned the

role of managing the due diligence process. Staffed with experienced employees, the due diligence team implements due diligence and oversight in collaboration with the relevant departments involved in raw material acceptance, manufacturing and shipping operations of the Copper & Precious Metals Division and group companies. During this reporting period, 53 employees underwent training related to supply chain due diligence.

(3) Transaction monitoring and recording

Hibi Kyodo Smelting monitors transactions with suppliers using the following procedures.

- 1) Nittetsu Mining and Furukawa Metals & Resources send the procurement policy of Hibi Kyodo Smelting and a Know Your Customer questionnaire (hereinafter “KYC”) to new suppliers of raw materials
- 2) PPC sends the supply chain policy of JX Metals and KYC to new suppliers of raw materials.
- 3) KYC responses are collected and assessed before procuring raw materials from them.
- 4) Mitsui Kinzoku’s raw materials department consolidates the above KYC, assesses the suppliers and place of origin, and shares relevant documents with applicable business sites and companies.
- 5) When raw materials arrive, Hibi Kyodo Smelting confirms the shared documents along with the actual raw materials.

The KYC covers corporate information, business details, board members, financial information, place of origin information, method of transporting raw materials, permits and licenses, ESG issues, human rights, Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT), initiatives for the protection of personal information, and supply chain management.

In addition to the KYC, we also assess suppliers based on information extracted from raw material invoices, packing lists, B/Ls, etc., such as their business partners, the country of origin for raw materials, the weight of raw materials, and transport methods.

During the reporting period, no high-risk suppliers or high-risk raw materials were identified.

(4) Confidential Grievance Mechanism

Based on the existing internal reporting system, a mechanism that allows employees and external stakeholders to anonymously submit concerns related to supply chain risks was developed and is being sustained.

In addition, a hotline, the “compliance consulting and reporting desk” was established. This is for external stakeholders and accessible from the website. There were zero complaints reported during the target period.

The “compliance consulting and reporting desk” can be found on our website.

<https://www.mitsui-kinzoku.com/en/contact/form/?frmid=57>

Step 2: Red Flags Identification and Risk Assessment

(1) Identify Risks

PAN PACIFIC COPPER, Nittetsu Mining and Furukawa Metals & Resources, prior to commencing business relationships with new suppliers, send the Copper Supply Chain Policy and KYC questionnaire to new suppliers to collect supplier information.

Purchasing contracts are signed with new suppliers only in cases where risks are deemed low based on raw material information, collected KYC questionnaires and third-party information. Third-party information is an effective tool for obtaining information related to suppliers and their shareholders. Based on information acquired from the SDN list, the Ministry of Finance of Japan, and the EU’s consolidated financial sanctions list, we conduct a survey of whether suppliers are added to major sanction lists.

Mitsui Kinzoku acquired fully completed KYC questionnaires from suppliers, conducted desktop research using the D&B Onboard, and thereby identified and evaluated supply chain risks. This process is an official requirement prior to entering any type of business relationship with a supplier. We conduct supplier evaluations based on company name, address, upstream company information, major shareholders, board members, record of financial crimes, place of origin information, method for transporting raw materials, permits and licenses, AML-CFT, initiatives for the protection of personal information, and supply chain management.

Information will also be collected related to a supplier’s corporate social responsibility policy, material violations of applicable sustainability laws, administrative actions based on legal requirements, and possession of the ISO14001 certification. We are also using information provided by a compliance information company to assess/evaluate suppliers.

The system manager will instruct the raw material purchasing officer to make a reconfirmation, in the event that recognition related to the supply chain and information are inconsistent based on a verification of the results of the supply chain due diligence as reported by the raw material purchasing officer. In the event raw material that violates the policy are purchased or are suspected to originate from CAHRAs, the system manager will report it to the supply chain officer and instruct the raw

material manager to halt the processing of and store the raw material, and have the raw material purchasing officer to conduct a local survey.

Given a decision will be requested on whether to proceed with business transactions based on the results of enhanced due diligence (including local survey results), it is the responsibility of the system manager to report to the supply chain officer. The supply chain officer will decide on whether to continue with business transactions and will need to report to the compliance officer and obtain approval. The compliance officer will share information related to potential negative impact that arises from transactions with suppliers with members of the Board of Directors.

The Company will assess/evaluate whether related parties, including the system manager, are appropriately performing duties in accordance with manuals and related regulations, and will take corrective measures in the event there are deviations. To secure full-fledged compliance, at the very least, we conduct an internal audit once a year. The person in charge of the internal audit will convey matters of deviation and survey results in writing to the target of the audit and report the internal audit results to the supply chain officer.

The target of the audit will promptly implement measures to correct the deviations discovered during the internal audit, and report on the details of these corrective measures to the system manager. Based primarily on the results of the internal audit, the system manager will conduct an annual report to the supply chain officer regarding the operational results for supply chain due diligence. The supply chain officer will provide clear-cut instructions in writing to the system manager.

Our supply chain due diligence (DD) manual and supply chain DD implementation regulations apply to all raw materials that are purchased and stipulates that supply chain due diligence should be implemented prior to the start of business transactions.

(2) Risk Classification

In the supply chain DD implementation regulations, we define, as follows, high risk based on location, high risk based on supplier and high risk based on raw materials.

Raw materials are considered high risk if any of the following applies:

- Case where it is alleged the raw materials originate from, are transported through, or transported from a Conflict-Affected and High-Risk Area (CAHRAs), where human rights infringements occur.
- Case where it is known that the raw materials come from or pass through CAHRA or alleged that the raw material originate from a rationally suspected country.
- Case where it is alleged there are limited known reserves in said country.

A supplier is deemed high risk in the following cases:

- Case where a supplier or other stakeholders related to supply meets one of the high-risk criteria based on location.
- Case where high-risk business activities are being carried out, including weapons, gambling, the casino industry, antiques and fine arts, religion and religious leaders.
- Case where it is known that gold was supplied from a high-risk country in the past 12 months.
- Case where supplied documents have substantial discrepancies or inconsistencies, or in which the other party refuses to provide requested documents.

(3) Designation of CAHRAs

Hibi has adopted the CAHRAs identified by JX Metals with the following information.

- The Democratic Republic of Congo (DRC) and the nine neighboring countries designated under the US Dodd-Frank Wall Street Reform and Consumer Protection Act
- Countries and regions on the EU CAHRAs List of the EU Conflict Minerals Regulation
- Countries and regions classified as Intensity 5 according to the Heidelberg Conflict Barometer
- Latest Fragile States Index ranking
- Countries and regions classified as Jurisdictions under Increased Monitoring or Subject to a Call for Action by the Financial Action Task Force on Money Laundering
- Statement from the Office of the United Nations High Commissioner for Human Rights
- Responsible Sourcing Newsletter and Good Delivery Sourcing Advisory published by the LBMA.

With regard to copper raw materials, we designate 46 countries as CAHRAs as of September 30, 2024. Mitsui Kinzoku explicitly informs concerned parties that it will not continue or enter into new contracts with countries subject to international sanctions.

No high-risk suppliers were identified during the reporting period.

(4) EDD measures

Should it be determined that the content of the collected KYC questionnaires deviates from the policy, a discussion will be held with stakeholders, a decision will be made to select who will visit the local site, and a local visit (survey) will be carried out.

When implementing enhanced due diligence (EDD), the following procedures will be carried out:

- The goal is to corroborate the documented KYC information.
- The EDD will focus on surveying threatening financing risks and the results of a specific supply chain due diligence.
- Should it be recognized that there is a possibility of a violation to the Copper Supply Chain Policy,

EDD must be carried out three months prior to commencing a business transaction.

- A site visit shall be carried out by individuals selected through a discussion with stakeholders.

All related parties that will implement the site visit must consent to reporting the results of the visit both truthfully and accurately. If applicable, an EDD will be implemented after a discussion between internal and external related parties (Example: Regional and central regulatory authorities, upstream companies, international or civic community organizations, or third parties that have an influence over related parties).

- When preparing a site visit report, a site visit report template, included in the refiners toolkit, must be used.
- Depending on the number of and seriousness of identified issues, a follow-up must be conducted.

We collect data related to the weight and copper grade of copper concentrate for each delivery of raw material received. The weight and copper content of the copper raw materials are compared with the official data to confirm that it is lower than the known reserves in the country where it was mined. No EDD suppliers were identified during the reporting period.

STEP 3: Risk Management

We are formulating a risk management strategy for specified risks.

Contracts with suppliers shall be terminated should said suppliers conduct serious human rights infringements or support non-state armed groups.

Aside from serious human rights infringements or supporting non-state armed groups, should risks in Appendix II be recognized, business transactions will temporarily be suspended, and the continuation of transaction will be subject to a continued survey or the implementation of improvement plans.

The content of KYC questionnaires sent in by suppliers will be confirmed by the raw material purchasing officer. Following this, the system manager will use third-party information related to the place of origin and supplier risks to re-assess/re-evaluate the content of the KYC questionnaire.

Should the system manager determine the supply chain is high risk, the visiting parties will be decided through consultation with stakeholders, and conduct a visit of the site.

The system manager will report the results of the site visit to the supply chain officer.

After receiving the report, the supply chain officer will decide whether a business relationship should be commenced or continued, and determine what actions and measures should be taken.

The due diligence team will report on decision-making to the compliance officer, make a final decision, and share this information with the Board of Directors.

The system manager will formulate an improvement plan for suppliers who were assessed/evaluated to be high risk, request that the plan be implemented, and oversee the progress of the improvement plan. The system manager will assess/evaluate the results of the improvement plan implemented by the supplier, and report the assessment/evaluation results to the supply chain officer.

During the target period, the Mitsui Kinzoku Group did not specify the following risks:

- (i) Mitigate risk while continuing to carry out business transactions
- (ii) Mitigate risk while suspending business transactions
- (iii) Terminate business transactions

In accordance with the improvement report prepared by a supplier, the supply chain officer must determine whether to suspend transactions, continue transactions or resume transactions. Following this, the supply chain officer will report the results of this decision to the compliance officer, make a final decision and share this information with the Board of Directors.

See the integrated report for an overview of the businesses operated by the Mitsui Kinzoku Group, its strategies, and corporate value creation plan.

https://www.mitsui-kinzoku.com/toushi/lib/integrated_report/

20,January,2025