



**Doc ID:**

BRN\_POL\_RMSC

**Issue Date:**

August 2023

**Revision Date:**

November 2024

**Status**

Approved

## Responsible Mineral Supply Chain Policy

### I. PURPOSE

This policy establishes the general commitments and guidelines of Brazilian Nickel Limited (BRN) to ensure that proper due diligence systems are used to address risks in the supply chain of minerals from conflict or high-risk areas.

### II. SCOPE

This policy is endorsed by BRN Executive Management, and applies to:

- BRN and all areas of Group operations including all Local Operating Companies, and other projects and offices where BRN has a controlling influence.
- All employees of BRN or any of its subsidiary companies, including temporary staff and any personnel included in agreements with partners, suppliers, contractors, subcontractors, consultants and other third parties.
- All aspects of our business (where we have control &/or influence) associated with our normal, abnormal and emergency activities including, but not limited to: exploration activities, project development, operations, supply of raw materials and services, delivery to customers, emergency response, and project decommissioning.

### III. INTRODUCTION

BRN produces nickel-cobalt containing products by processing ore from its own mine in Piau , northeastern Brazil.

Therefore, BRN currently does not source any minerals from third-party suppliers. Nevertheless, with commitment to responsible practices, the company is well-prepared for changes in its sourcing strategy and has implemented internal policies and procedures to meet international standards to maintain responsible operations and ensure a conflict-free supply chain.

This policy is consistent with other internal policies including the Code of Ethics and Conduct for Employees & Suppliers, Anti-Corruption & Anti-Bribery Policy, Anti-Money Laundering and Anti-Terrorism Financing Policy and Security Policy.

### IV. POLICY STATEMENTS

**Prepared by:**

Technical Director

**Reviewed by:**

CSO

**Approved by:**

CEO



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Recognizing the potential risks associated with mineral extraction from conflict-affected and high-risk areas (CAHRAs), BRN upholds its responsibility to maintain ethical practices and respect human rights. The company adheres to the guidelines set forth in the Organization for Economic Cooperation and Development (OECD)'s "Guide to the responsible management of mineral supply chains in conflict and high-risk areas".

BRN commits to the following principles and requires its mineral suppliers to:

- Maintain an internal management system that supports due diligence in the mineral supply chain;
- Conduct a Responsible Minerals Assurance Process (RMAP) assessment to verify its conflict-free status;
- Communicate its due diligence policies and practices both internally and externally and incorporate any emerging issues into contracts or agreements;
- Place a high value on human rights in all aspects of its activities and value chain. The company firmly opposes and will not tolerate any involvement in activities that contribute to human rights violations, including torture, cruel, inhuman and degrading treatment, forced labour, child labour, gross human rights violations and abuses, war crimes, crimes against humanity, or genocide;
- Support the Extractive Industries Transparency Initiative (EITI), recognizing that transparency is vital in fostering positive relationships between the state, companies, and civil society. The company ensures compliance with all taxes and royalties related to mineral extraction, trade, and export as per current applicable rules and their disclosure;
- Follow the five-step due diligence process defined in the OECD Guidance Annex I; and
- Provide transparency in the implementation of this policy. The company provides regular progress reports to customers, relevant stakeholders, and the public as needed.

By adopting these measures and maintaining its dedication to ethical practices, BRN ensures that its operations contribute to sustainable development while avoiding any involvement in activities that may harm human rights or the environment.

<b>Prepared by:</b> Technical Director	<b>Reviewed by:</b> CSO	<b>Approved by:</b> CEO
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If the company identifies suppliers and/or third parties linked to the mineral supply chain that do not comply with this policy, the best efforts will be made to apply corrective actions in the short term. If this is not possible, trade relations will be suspended, according to the commitments declared in this policy.

**Prepared by:**

Technical Director

**Reviewed by:**

CSO

**Approved by:**

CEO