


MANUAL FOR OPERATION		
Document: TKK2-4	Name of instruction: <b>COBALT SUPPLY CHAIN POLICY</b>	
Date: 31.05.2025	Prepared by: Michael Brunner	
Version: 6	Accepted by: Sami Kallioinen	

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Changes are indicated as follows:

- \* new or amended line or sentence
- \*\* new or amended paragraph
- \*\*\* new or fully amended code

## COBALT SUPPLY CHAIN POLICY

### 1. General

Jervois Finland Oy (JFO) is a downstream producer of cobalt specialty chemicals and metal powders. JFO is committed to operate based on strict safety, environmental and ethical standards as outlined by Jervois Global Ltd.'s (JRV) corporate policies. JFO's Cobalt Supply Chain Policy ("Policy") adopts both JRV's corporate policies as well as the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance"). The Policy was developed to meet the stringent expectations of various stakeholders within our sector. \*The Cobalt Supply Chain Policy is subject to annual management review.


JFO commits itself to manage its cobalt raw material supply chain based on the five steps framework in Annex 1 of the OECD Guidance:

1. Establish strong company management systems
2. Identify and assess risk in the supply chain
3. Design and implement a strategy to respond to identified risks
4. Carry out independent third-party audit of supply chain at identified points
5. Report on supply chain due diligence

Suppliers and their sub-suppliers of cobalt raw materials, cobalt-containing scrap/recycled materials and refined cobalt solutions are expected to conduct their activities and operations in a responsible manner as described in JRV's [Code of Ethics and Business Conduct](#) and attached [Supplier Standard](#).

When our raw material sources are in high-risk areas, we will directly refer to Annex II of the OECD Guidance for our risk management approach. The purpose is to ensure that the below main risks detailed in Annex II of the OECD Guidance are not present in the supply chain:

- Serious abuses associated with the extraction, transport, or trade of minerals:
  - Any forms of torture, cruel, inhuman and degrading treatment;
  - Any forms of forced or compulsory labour;
  - The worst forms of child labour;
  - Other gross human rights violations and abuses such as widespread sexual violence;
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Direct or indirect support to non-state armed groups who:
  - \*illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
  - illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
  - illegally tax or extort intermediaries, export companies or international traders.

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- **\*\*Direct or indirect support to public or private security forces who:**
  - illegally control mine sites, transportation routes and upstream actors in the supply chain and/or
  - illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded and/or
  - illegally tax or extort intermediaries, export companies or international traders.
- **Bribery and fraudulent misrepresentation of the origin of minerals:**
  - **\*Money laundering** resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers;
  - **\*Non-payment of taxes, fees, and royalties due to governments**


We commit to working cooperatively with organizations and agencies such as the OECD, Responsible Minerals Initiative, and relevant industry associations to establish credible and effective processes that isolate and eliminate non-ethical mining, and trade, and allow continuation of legitimate activity in “conflict regions”.

## 2. Definitions

- 2.1 Safety standards refers in general to topics such as safe work environment, safe work practices, process safety, equipment safety, fire safety and emergency plans. Applicable standards are covered by management system such as OHSAS 18001 or ISO45001.
- 2.2 Environmental standards, in general, refer to topics such as emission control, waste and hazardous material handling, environmental protection, energy, and efficient use of natural resources. Applicable standards are covered by management systems such as ISO 14001.
- 2.3 Business and operational ethics refer to the respect for human rights, including prohibiting forced labor, child labor, discrimination, and harassment. The terms also refer to topics including corruption and bribery. Applicable guidelines are defined by OECD Guidelines for Multinational Enterprises, OECD Guidance, United Nations Guiding Principles on Business and Human Rights, and International Labor Organization (ILO) guidelines and principles.

## 3. Minimum expectations

- 3.1 Suppliers must comply with all applicable local and international laws and regulations.
- 3.2 Suppliers must demonstrate their intent and strive for high operating standards in the areas of safety, environment, and business ethics.
- 3.3 Suppliers must be able to track and maintain custody of their raw material flow from the mine site to delivered product.
- 3.4 Suppliers must undertake mineral supply chain due diligence and risk management programs consistent with the standards defined in Annex II of the OECD Guidance.

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- 3.5 Suppliers must cooperate with JFO to conduct on site evaluations to assess compliance with this policy.
- 4. Assessment of compliance
  - 4.1 Each supplier is assessed to review the level of compliance with this policy and to identify potential risks related to compliance.
- 5. Non-compliance
  - 5.1 A risk management plan will be developed in the event a supplier assessment identifies a reasonable risk that the supplier is not able to meet the minimum expectations.
  - 5.2 In the event that a supplier is not willing to adopt a risk management plan or repeatedly fails to mitigate the identified risk as set out in the risk management plan, JFO will reassess the situation to conclude appropriate actions.

Kokkola 31<sup>st</sup> May 2025



Sami Kallioinen  
President