

Code of Conduct

Mining Mineral Resources S.A.S.

Revision II

1. Ethical Business Practices

We are committed to conducting our business with the highest ethical standards. Integrity and transparency are the foundations of our operations. We uphold a strong whistleblower protection policy, ensuring that employees and stakeholders can report unethical behavior confidentially and without fear of retaliation. Integrity and transparency are the foundations of our operations. To prevent conflicts of interest and bribery, we maintain a comprehensive Register of Interest (RoI) and enforce strict anti-corruption policies.

2. Responsible Sourcing and Supply Chain Due Diligence

We adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, ensuring that our sourcing of tin, tantalum, and tungsten does not contribute to armed conflict or human rights abuses. Our Supply Chain Policy outlines rigorous due diligence measures, including risk assessment mechanisms such as supplier audits, traceability programs, and real-time monitoring tools. We conform to the Responsible Minerals Assurance Process (RMAP), undergoing regular third-party audits to ensure compliance and ethical sourcing.

3. Reputation & Commitment to International Standards

We strive to enhance the standards, image, and reputation of MMR as a world-leading smelter, refiner, and value-adder to tin, tantalum, and tungsten. Our operations comply with international regulations, including the EU Conflict Minerals Regulation, to ensure responsible sourcing and ethical practices.

4. Product and Service Excellence

We are dedicated to providing the highest level of service and superior quality products to our customers, ensuring compliance with international standards and continuous improvement in our processes.

5. Workplace Safety, Health, and Environmental Stewardship

We provide a safe and healthy working environment for employees, contractors, and visitors. Our commitment is supported by our Safety Policy and Environmental Policy, which align with ISO 14001 standards and are subject to third-party audits. We implement comprehensive workplace health initiatives, including regular safety drills, occupational health screenings, and certified safety training programs for employees to ensure compliance with best practices in workplace safety.

6. Equal Opportunity Employment and Labor Rights

As an equal opportunity employer, we comply with all relevant labor laws and trade union regulations. Our Human Resources Management, Training, and Employee Development policies align with ISO 9001 standards and are subject to third-party audits. We strictly prohibit child labor and forced labor in our operations and supply chain. We enforce this policy through rigorous supplier audits, real-time monitoring, and mandatory compliance certifications. Additionally, we have a remediation strategy in place to address any identified violations, including supplier engagement, corrective action plans, and collaboration with relevant human rights organizations.

7. Community Engagement and Social Responsibility

We uphold the principles of free enterprise and recognize the importance of social responsibility. Our Community Relations Committee, comprising company representatives and local community members, ensures meaningful engagement. This is reinforced by our Community Relations Policy, which promotes sustainable development and respect for local cultures.

8. Legal Compliance and Anti-Corruption

We adhere to all applicable laws related to raw material sourcing, smelter and refinery operations, and environmental performance. Our Anti-Corruption Policy enforces zero tolerance towards bribery and corruption, ensuring ethical conduct in all business dealings.

9. Stakeholder Engagement and Transparency

We actively engage with and support all stakeholders to prevent unlawful practices through community consultations, transparency reports, and stakeholder advisory panels. These initiatives ensure continuous dialogue, feedback, and accountability in our operations. This commitment is reinforced by our Register of Interests and regular transparent reporting on our operations and supply chain activities.

10. Continuous Improvement and Accountability

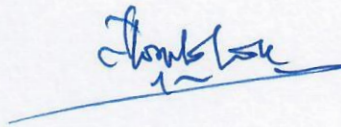
We are committed to continuous improvement in all aspects of our operations. Regular audits, stakeholder feedback, and performance evaluations are integral to our approach, ensuring accountability and adherence to our Code of Conduct.

11. Corporate Responsibility & Human Rights


We are committed to upholding human rights in all aspects of our operations and supply chain. Our policies align with the UN Guiding Principles on Business and Human Rights, ensuring we operate responsibly and ethically. MMR strictly prohibits child labor, forced labor, and human rights violations in any form. Our Supply Chain Policy and internal audits reinforce these commitments, ensuring that we earn the trust of our customers, suppliers, and industry stakeholders.

Compliance and HR Contacts

Compliance Department:
Mr. John Matt – Compliance Manager
Email: john.matt@mmdrc.com



HR Department:
Mr. Ashok Kumar Tiwari – HR Manager
Email: ashok.tiwari@mmdrc.com



VERSION: 02.2025 – UPDATED AS OF FEBRUARY 2025
PREPARED BY: CORPORATE COMPLIANCE TEAM
APPROVED BY: SENIOR LEADERSHIP
ISSUED BY: MMR MANAGEMENT

