

## Mineral Supply Chain Due Diligence Assessment

### Summary Report

Assessed Party	La Miniere De Kalukundi S.A.				
Assessment Date	08/15-08/17 & 08/19/2024				
Assessed Material	Cobalt				
Assessment Type	<input checked="" type="checkbox"/> Main Assessment <input type="checkbox"/> Tracking Assessment				
Assessment Result	<input type="checkbox"/> AAA	<input checked="" type="checkbox"/> AA	<input type="checkbox"/> A	<input type="checkbox"/> B	<input type="checkbox"/> C
Assessment Firm	China Standard Conformity Assessment CO., LTD (CSCA)				
Assessor	Hou Chao, Yang Dong				

## Instruction

### Objective

This assessment program is an independent third-party assessment conducted by China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCCMC) based on *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*, and *Cobalt Refiner Supply Chain Due Diligence Standard (Version 2.0)*, aiming to assess the performance of the Company's due diligence management system and process, and support the Company to identify the gaps that need further improvements and develop corresponding improvement measures.

### Basis of the Assessment

The assessment is based on *Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition)*, hereinafter referred to as *the Guidelines*, and *Cobalt Refiner Supply Chain Due Diligence Standard (Version 2.0)*. The companies shall meet the content of "Companies should" in *the Guidelines*. "Companies should" refers to specific requirements of *the Guidelines* for companies' due diligence management, as well as the specific refinement of the requirements, which is consistent with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Third Edition)*.

### Explanation of Conformity Degree

**Conformity:** Indicates that the Company's management system, policies, procedures or processes meet the requirements of corresponding provisions of *the Guidelines*.

**Need improvement:** Indicates that the Company's management system, policies, procedures or processes partially meet the requirements of corresponding provisions of *the Guidelines*, but lack some necessary elements or content, or can not prove or lack evidence to prove that they are substantively functional, and further measures are needed to improve its performance.

**Non-conformity:** Indicates that the Company's management system, policies, procedures, or processes cannot meet the requirements of corresponding provisions of *the Guidelines*, resulting in systematic and repetitive non-conformities.

**Not applicable:** Indicates that corresponding provisions of *the Guidelines* do not apply to the Company.

**Zero tolerance:** If any of the following situations occurs, it is a "zero tolerance" situation.

1. Misrepresentation, deliberately forging false evidence or vouchers;
2. Any form of support for illegal control, or illegal taxation and extortion by non-state armed groups;
3. Any form of torture, cruel, inhuman and degrading treatment;
4. Directly cause or contribute to forced or compulsory labor;
5. Cause or contribute to widespread sexual violence;
6. The worst forms of child labor;
7. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
8. Other situations generally considered unacceptable.

## Explanation of Assessment Results

The overall assessment result is based on the percentages of "non-conformity" items and "need improvement" items. The China Chamber of Commerce of Metals, Minerals & Chemical Importers & Exporters (CCCMC) provides the following suggestions on the assessment results:

Level AAA: There is no "non-conformity" items, indicating that the Company has excellent supply chain due diligence management performance.

Level AA: the percentage of "Need improvement" items does not exceed 15% of all applicable items, and the percentage of "non-conformity" items does not exceed 5% of all applicable items.

Level A: the percentage of "Need improvement" items does not exceed 25% of all applicable items, and the percentage of "non-conformity"

items does not exceed 10% of all applicable items.

Level B: the percentage of "Need improvement" items does not exceed 35% of all applicable items, and the percentage of "non-conformity" items does not exceed 20% of all applicable items.

Level C: The above level cannot be reached or there is any "zero tolerance" situation.

### **Description of Assessment Type**

The assessment is divided into main assessment and tracking assessment. The main assessment needs to be carried out once a year. The tracking assessment is conducted every six months or during the re-assessment (main assessment) based on the conformity degree and assessment results.

## 1. Assessed Party

Company Name	La Miniere De Kalukundi S.A.
Refinery Name	La Miniere De Kalukundi S.A.
Location	Pompi Mine, Lubdi District, Lualaba Province, Democratic Republic of Congo
Profile Number	DDMSC-CNCuCo0052

## 2. Assessment Results

Type	<input checked="" type="checkbox"/> Main Assessment		<input type="checkbox"/> Tracking Assessment		
Result	<input type="checkbox"/> Level AAA	<input checked="" type="checkbox"/> Level AA	<input type="checkbox"/> Level A	<input type="checkbox"/> Level B	<input type="checkbox"/> Level C

## 3. Assessment Scope

Materials	Cobalt
Types of Materials	<input checked="" type="checkbox"/> Mine materials <input type="checkbox"/> Recycled materials <input type="checkbox"/> Both
Assessment Period	<input checked="" type="checkbox"/> 12 months: 06/01/2023-05/31/2024 <input type="checkbox"/> Less than 12 months:

## 4. Summary of Assessment Results

Assessment Result	AA
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Step 1: Establishing A Corporate Due Diligence System	
Develop and adopt due diligence policy.	The Company has formulated and publicly released the <i>Mineral Supply Chain Due Diligence Management Policy</i> on its official website, in line with the requirements of the <i>Chinese Due Diligence Guidelines for Mineral Supply Chain</i> .
Structure appropriate internal management systems.	The Company has established the Mineral Supply Chain Due Diligence Management Committee and the Joint Office for Supply Chain Due Diligence Management, appointed senior management to be responsible for Due Diligence Management, and regularly conducts supply chain Due Diligence management training.
Establish a system of controls and transparency over the supply chain.	The Company has established the supply chain control and transparency system, and formulated the <i>Mineral Supply Chain Due Diligence Management Procedure</i> . For supply chains that trigger warning signs, the Company required to further collect mineral supply chain traceability information needed for reviewing supply chain warning signs.
Strengthen engagement with suppliers.	The Company has developed the <i>Supplier Code of Conduct</i> and <i>Due Diligence Management Statement and Commitment</i> , and required its suppliers to sign them, ensuring they adhere to policies consistent with the Company's <i>Mineral Supply Chain Due Diligence Management Policy</i> . The Company has conducted

	due diligence management capacity building for suppliers through on-site training and exchanges, and retained training records.
Establish a Company level grievance mechanism and/or participate an industrial level grievance mechanism.	The Company has formulated the <i>Supply Chain Due Diligence Management Grievance Mechanism and Handling Methods</i> . The Company has identified and committed to participating in the grievance mechanism at the industry level.
<b>Step 2: Risk Identification and Assessment</b>	
Conduct warning signs review, and identify the scope of the risk assessment of the mineral supply chain based on the results of warning signs review.	The Company has formulated the <i>Conflict-Affected and High-Risk Areas (CAHRAs) Identification Procedure</i> , and has conducted the warning sign review on their supply chain accordingly.
When warning signs are identified, companies shall conduct an on-the-ground assessment of the corresponding supply chain.	During this assessment period, the Company has conducted warning sign review and identified the warning signs. The Company, in conjunction with external experts, carried out the on-the-ground assessment and developed an <i>On-the ground Assessment Report</i> .
Assess risks in the supply chain.	The Company has formulated the <i>Mineral Supply Chain Risk Management Procedure</i> and has conducted supply chain due diligence management risk identification and assessment, and formulated the <i>Mineral Supply Chain Risk Identification and Assessment Report</i> .

<b>Step 3: Risk Prevention and Mitigation</b>	
Report risk assessment results internally.	The Company has formulated the <i>Risk Assessment Result Report Form</i> and reported the risk assessment results to the senior managers of Due Diligence Management Committee.
Develop and adopt risk management plan.	The Company has formulated and approved the <i>Risk Management Plan</i> , including the <i>Risk Management Plan Table</i> and the <i>Implementation Monitoring Form of Risk Management Plan</i> , covering mitigation strategies for different types of risks.
Implement risk management plan, monitor and track performance of risk mitigation strategies.	The Company, in conjunction with stakeholders, formulated the <i>Risk Management Plan</i> and the <i>Risk Management Plan Implementation and Monitoring Table</i> , jointly promoted the implementation of <i>Risk Management Plan</i> and regularly monitored the implementation of the <i>Risk Management Plan</i> .
Supplementary assessment of risks that need to be mitigated. Supplementary assessment can also be conducted after actual circumstances have changed.	The Company has formulated an <i>Additional Risk Assessment Need Form</i> to ensure that supplementary assessments can be conducted on the risks that need to be mitigated.
<b>Step 4: Internal and External Assessment</b>	
Companies should establish internal assessment system, to continuously monitor and manage due diligence performance.	The Company has established an internal assessment team for supply chain due diligence management and formulated the <i>Internal Assessment Work Plan</i> . The assessment team has conducted an internal assessment and developed an <i>Internal Assessment Report</i> .



Companies should designate the second or third party to conduct assessment when applicable.	It's the first time for the Company to participate in the independent third-party assessment for cobalt supply chain due diligence management.
When necessary, the Company at the key points (smelters/refiners) makes necessary disclosures on the assessment results.	The Company has committed to releasing the Assessment Summary Report of Supply Chain Due Diligence to the public.
<b>Step 5: Reporting and Communication</b>	
Develop due diligence progress report	The Company has formulated the <i>La Miniere De Kalukundi S.A. Minerals Supply Chain Due Diligence Progress Report</i> . Further improvement is needed in terms of the completeness of the disclosed content in the report.
With due regard to business confidentiality and other competitive concerns, companies should publish due diligence progress reports or summary.	The Company has released the <i>La Miniere De Kalukundi S.A. Minerals Supply Chain Due Diligence Progress Report</i> on its official website. Link: <a href="http://en.norinmining.com/attach/0/cbd99375b2494db99774086d8a40f772.pdf">http://en.norinmining.com/attach/0/cbd99375b2494db99774086d8a40f772.pdf</a>
<b>Step 6: Provide for or Cooperate in Remediation When Appropriate</b>	
When the Company recognize that it has caused or contributed to actual adverse impacts, they should mitigate these impacts by providing for or cooperating in remediation when appropriate.	N/A

Companies provide conditions or cooperate with existing remedial mechanisms in a timely manner.	N/A
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