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Responsible Sourcing Policy

1 INTRODUCTION

Boliden provides the metals essential to improve society for generations to come, with a vision to be the most climate-friendly and respected metals provider in the world. Responsible sourcing forms an integral part of this vision and Boliden strives to offer a long-term commitment to our business partners, with shared values of ethical and responsible business conduct.

This Responsible Sourcing Policy sets out the key underlying principles and requirements for when we source goods, materials and services and when managing our relationship with suppliers. A supplier is understood as a company or organization that sells, leases or provides materials, goods or services to Boliden.

To give effect to this Policy, internal guidelines, instructions and templates have been developed to support supplier due diligence processes. This Policy shall be read in conjunction with Boliden's broader Policy framework and bases itself on the same fundamental frameworks outlined in Boliden's *Business Partner Code of Conduct*.

2 WHAT IS RESPONSIBLE SOURCING

Responsible sourcing is our commitment to consider the impact of our business activities and supply chains on people, the planet and society as part of our core business strategy.

Impact is understood as both positive and negative, whereby responsible sourcing can contribute towards sustainable development while a failure to prevent or mitigate adverse impacts can lead to serious harm to people, the environment or society as well as adverse impacts on Boliden.

3 SCOPE

This policy applies to:

a) All employees, directors and officers, as well as any other person whose work is supervised by Boliden as though that person were a Boliden employee;
b) All Boliden operations, including all subsidiaries to Boliden, and to Boliden joint ventures, over which Boliden is able to exercise control, either directly or indirectly, with respect to policies and procedures. For those joint ventures over which Boliden is unable to exercise control, Boliden will endeavor to influence the joint venture's policies and practice, so that they reflect the values described in this policy;

c) Any other person or entity to the extent that they act on behalf of any of the above entities in any way, including consultants, contractors, suppliers, agents or intermediaries.

4 COMPLIANCE

Boliden conducts background checks, including sanctions screening, to verify the identity and legitimacy of the business partner and its beneficial owners prior to entering any business relationship.

All business agreements and transactions are covered by a written agreement (e.g. contract or order acknowledgement). The agreement shall at all times include Boliden's model sanctions clause and Boliden's *Business Partner Code of Conduct*. Deviations may only be approved by Boliden's Chief Ethics & Compliance Officer and Group Legal.

Consultation with independent internal and/or external subject-matter experts shall be conducted when necessary, to ensure compliance with all relevant requirements prior to entering into a written agreement with a supplier.

5 COMMITMENTS

We expect our suppliers to share our commitment of ethical and responsible business conduct. Requirements and expectations for suppliers are outlined in Boliden's *Business Partner Code of Conduct*.

Boliden uses its leverage within a business partnership, or jointly through membership in networks and organizations, to advance these Policy commitments whenever possible. When deemed necessary, we will strive to assist suppliers in building capacities with a view to advancing responsible business practices within the supply chain.

Reasonable measures are being taken to ensure that business partners in our supply chains are in compliance with relevant legislation as well as Boliden's *Business Partner Code of Conduct*. To achieve this, we conduct risk-based due diligence, appropriate to the particular supply chain, in order to identify, assess, address, mitigate and/or remedy risks and adverse impacts. For suppliers of metals and minerals, we comply with the 5-Step due diligence framework set out in the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (see further in Annex 1).

Sufficient resources are allocated to ensure these commitments are upheld and adequate capacity building provided to employees involved in sourcing. High or critical risk suppliers are escalated to senior management, in line with established escalation frameworks, for review and decision-making.

We publicly communicate on how we implement our supplier due diligence obligations and promote transparency over the supply chain in so far as reasonable, while not disclosing information that may have adverse impacts on Boliden's competitive position.

This policy and the associated due diligence procedures shall be monitored and are subject to periodic internal review.

6 RAISE CONCERNS

Boliden employees, suppliers and all stakeholders are expected to raise concerns, complaints and grievances related to breaches, whether suspected or materialized, of this Policy. Raising concerns serves both as an important mechanism enabling access to remedy as well as an early-warning risk-awareness mechanism, to avoid or mitigate future harm.

Concerns can be raised with the Group Ethics & Compliance, via **ethics@boliden.com**, local HR, the mines stakeholder feedback portal or via Boliden's anonymous whistleblower reporting channel at www.boliden.com.

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ANNEX 1

Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas

1. Boliden recognizes risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas and recognizes its responsibility to respect human rights and not contribute to conflict. Boliden is committed to responsible sourcing and complies with the OECD requirements on the sourcing of minerals from conflict-affected and high-risk areas. Boliden does not engage in actions which contribute to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

2. Boliden's risk based due diligence framework for suppliers of minerals is in compliance with the OECD '5-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain', as outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 3rd Edition ('the OECD Guidance'). As such, Boliden is fully committed to ensure that when sourcing from conflict-affected and/or high-risk areas, we would neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

    a. any forms of torture, cruel, inhuman and degrading treatment;
    b. any forms of forced or compulsory labour, which means work or service which is obtained from any person under the menace of penalty and for which said person has not offered themselves voluntarily;
    c. any form of modern slavery, including forced labour and child labour (as defined by the International Labour Organization) in their operations;
    d. work performed by a person younger than the age for completing compulsory education or younger than 15 years;
    e. other gross human rights violations and abuses such as widespread sexual violence;
    f. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

3. Boliden will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 2 of Annex 1.

Regarding direct or indirect support to non-state armed groups:

4. Boliden will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

    a. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
    b. 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
    c. illegally tax or extort intermediaries, export companies or international traders.

5. Boliden will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 4 of Annex 1.

Regarding public or private security forces:

6. Boliden will not tolerate any direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

7. The role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

8. If a supplier contracts public or private security forces, we require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights

and that the Boliden's supplier has adopted screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

9. Boliden will monitor, and support efforts where possible, to ensure that principles of transparency, proportionality and accountability in payments made to public security forces for the provision of security are realized and that the exposure of vulnerable groups to adverse impacts associated with the presence of security forces on mine sites is avoided or minimized.

10. If a resonable risk exists relating to public or private security forces, Boliden will immediately devise, adopt, and implement a risk management plan with suppliers in order to prevent or mitigate the risk. The risk management plan will include regular dialogue with the supplier and if adequate mitigation within six months from the adoption of the risk management plan is not realized, we will suspend or discontinue our engagement with the business partner.

Regarding bribery, money laundering, payments to government and fraudulent misrepresentation of the origin of minerals:

11. In line with Boliden's Code of Conduct and Anti-Corruption Policy, we have zero tolerance to bribery, corruption, financial crimes or improper payments of any kind, both within our own organization and in relation to business partners. This includes a zero tolerance to:

    a. Solicit bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export;
    b. Money laundering, including as it results from, or is 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.

12. Boliden will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with our position in the value chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

13. If a reasonable risk exists regarding bribery, money laundering, payments to government or fraudulent misrepresentation of the origin of minerals, Boliden is committed to engage

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with suppliers to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with suppliers after failed attempts at mitigation.