RESPONSIBLE GLOBAL SUPPLY CHAIN POLICY

Gold and Silver From Conflict-Affected and High-Risk Areas

Recognizing that significant adverse impacts may be associated with extracting, trading, handling and exporting gold and silver from conflict-affected areas, and recognizing our responsibility to respect human rights, we commit to refrain from action which contributes to the finance of conflict, to comply with relevant United Nations sanctions resolutions and laws implementing such resolutions, and to the following:

REGARDING SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF GOLD AND SILVER

1 We will neither tolerate nor profit from, contribute to, assist or facilitate the commission of:

- torture, cruel, inhuman and degrading treatment;
- forced or compulsory labour;
- child labour;
- human rights violations and abuses;
- non-compliance with environmental and sustainability responsibilities;
- war crimes, violations of international humanitarian law, crimes against humanity or genocide.

2 We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable prospect that they are committing, or are sourcing from or linked to any party committing, abuses described in paragraph 1.

REGARDING DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS

3 We will not directly or indirectly support non-state armed groups, including, but not limited to, procuring gold and silver from, making payments to or otherwise providing assistance or equipment to, non-state armed groups or their affiliates who illegally:

- control mine sites, transportation routes, points where gold and silver are traded and upstream actors in the supply chain; and/or
- tax or extort money or gold and silver at mine sites, along transportation routes or at points where gold and silver are traded, or from intermediaries, export companies or international traders.

4 We will not deal with, and will immediately discontinue engagement with, upstream suppliers where we identify a reasonable prospect that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as described in paragraph 3.

REGARDING PUBLIC OR PRIVATE SECURITY FORCES

5 We affirm that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including law that guarantees human rights. We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 1, or that act illegally as described in paragraph 3. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights.

REGARDING BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF GOLD AND SILVER

6 We will not offer, promise, give or demand bribes, and will resist the solicitation of bribes, to conceal or disguise the origin of gold and silver, or to misrepresent taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of gold and silver.

REGARDING MONEY LAUNDERING

7 We will support efforts and contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold and silver.

REGARDING THE PAYMENT OF TAXES, FEES AND ROYALTIES DUE TO GOVERNMENTS:

8 We 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 the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

GLENCORE

Claude Belanger
COO - North American Copper Assets