


Code of Conduct

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Record of Revisions:

Issue	Date	Summary and reason for change
1 st	January 2016	Initial Issue
2 nd	August 2022	Revised Issue
3 rd	January 2025	Revised Issue

If you have a query concerning the implementation or updating of this document, please contact the Compliance Team as an owner of this policy.

The policy takes effect on the day of publishing and can be accessed on Cezanne/Workspaces/Documents as well as on SharePoint.

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1. Introduction

Objective and Purpose of the Code of Conduct

The EITRM (EITRM) Code of Conduct establishes the fundamental ethical standards and behaviors expected of all employees, partners, suppliers, and external third parties. The primary objective of this Code is to create uniform benchmarks for integrity, transparency, and accountability that align with EITRM's values and mission.

This Code aims to ensure that all actions and decisions comply with applicable legal and internal requirements. By adhering to this Code, EITRM seeks to make a lasting contribution to innovation and resource security in the raw materials sector.

Commitment to Integrity and Accountability

EITRM is fully committed to upholding the highest standards of integrity and accountability in all its activities. This includes a conscientious use of resources, the promotion of diversity, and the creation of a respectful and inclusive workplace. Every employee and external partner play a role in safeguarding EITRM's reputation and contributing to a sustainable future in the raw materials industry.

This Code of Conduct is an essential component of EITRM's organizational structure and serves as a guide for daily interactions with colleagues, partners, and the public.

Target Audience and Scope

This Code of Conduct applies to:

- All employees of EITRM, regardless of their role or location.
- External third parties, such as contractors, suppliers, and consultants, who collaborate with EITRM or act on its behalf.
- Partner organizations, including academic institutions, start-ups, and industrial enterprises, that jointly execute projects or initiatives with EITRM.

The Code is designed to address the complex demands and challenges of the raw materials industry while ensuring compliance with the legal and ethical frameworks established by the European Union.

Binding Nature of the Code

The Code of Conduct is binding for all employees, partners, and external third parties. Violations of the standards outlined in this Code may result in appropriate measures, including internal actions, termination of contracts, or further steps in accordance with applicable laws.

The commitment to this Code begins with the onboarding process for new employees or the initiation of collaborations with external partners. The Code is regularly reviewed to ensure its relevance and effectiveness in light of evolving circumstances and requirements.

2. Values and Principles

Raw materials are the foundation of the European economy and a critical enabler of the green and digital transitions. At EITRM, we believe that upholding strong values is essential to driving innovation, sustainability, and collaboration across the raw materials sector. These values define how we work, how we engage with our partners, and how we contribute to Europe's industrial ecosystems.

Integrity, Respect, and Diversity

Integrity lies at the heart of EITRM's operations. It ensures that we act transparently and ethically in all our endeavors, building trust among our stakeholders and reinforcing our commitment to accountability.

Respect is fundamental to our vision, fostering an inclusive environment where individuals from diverse backgrounds and expertise collaborate to achieve common goals.

Diversity is a catalyst for innovation. EITRM thrives on the rich perspectives brought by its extensive network of partners across industry, academia, and research. By championing inclusivity and equal opportunity, we create the conditions for groundbreaking ideas to flourish and for all contributors to reach their full potential.

Transparency and Fairness

In an interconnected and competitive world, transparency is indispensable. At EITRM, we ensure that our decision-making processes are open and clear, enabling our stakeholders to engage with confidence. Our relationships with partners, suppliers, and employees are grounded in equity and trust. We strive to create a level playing field for all collaborators, ensuring that opportunities are accessible and merit-based, while decisions remain impartial and driven by our mission to advance Europe's raw materials sector. These principles align closely with the EU's focus on sustainability, competitiveness, and innovation.

Sustainability and Social Responsibility

EITRM is at the forefront of Europe's transition to a sustainable economy. Our commitment to sustainability extends across the entire raw materials value chain, from exploration and mining to recycling and substitution. By integrating circular economy principles into our work, we actively reduce environmental impact and secure resources for future generations.

Social responsibility is integral to our mission. We promote the well-being of workers, respect human rights, and invest in the communities we serve. From training future innovators to supporting industry professionals, EITRM empowers individuals to lead the way in shaping a sustainable raw materials sector. Through these principles, we aim to strengthen Europe's global competitiveness while contributing to a more resilient and sustainable future. Our shared values unite us as a community and guide our journey toward impactful and enduring change.

These efforts reflect the EU's core values, such as promoting human rights, environmental protection, and combating corruption, as enshrined in the UN Global Compact principles.

Shared Values of the EU and EIT

EIT and its KICs, including EITRM, are guided by the fundamental values of the EU as articulated in treaties and legal frameworks. These include:

- Equality and Non-Discrimination: Promoting equal opportunities and diversity in all activities.
- Good Governance: Upholding the highest standards of transparency and ethics, particularly by avoiding conflicts of interest.
- Environmental and Resource Stewardship: Committing to responsible resource management and fostering a sustainable economic system.

By integrating these principles, we aim to enhance Europe's global competitiveness while contributing to a resilient and sustainable future. Our shared values unite us as a community and guide our journey toward impactful and enduring change.

3. Standards of Conduct

3.1. Collaboration and Workplace Culture

At EITRM, we believe that a strong and inclusive workplace culture is essential for fostering innovation and achieving our mission. Our commitment to collaboration and mutual respect ensures that all employees and partners can contribute their best in a supportive and equitable environment.

Diversity, Inclusion, and Equal Opportunity

EITRM values the unique perspectives, skills, and experiences that individuals bring to our organization. We are dedicated to creating an environment where everyone—regardless of gender, ethnicity, religion, age, sexual orientation, or disability—has equal access to opportunities and resources.

We promote inclusion and diversity across all levels of the organization and within our partnerships. By embracing these principles, we create a vibrant and dynamic community that drives creativity and innovation in the raw materials sector.

Prohibition of Discrimination, Bullying, and Harassment

EITRM has zero tolerance for any form of discrimination, bullying, or harassment. These behaviors undermine trust, respect, and collaboration and are strictly prohibited.

Employees, contractors, and partners are encouraged to report any incidents or concerns through designated channels, ensuring a safe and respectful workplace for all. Retaliation against those who raise concerns in good faith is also prohibited, reinforcing our commitment to fairness and accountability.

Health and Safety in the Workplace

The well-being of our employees and partners is a top priority at EITRM. We are committed to maintaining a safe and healthy work environment that meets or exceeds applicable health and safety standards.

This includes proactive risk assessments, ongoing training, and access to resources that promote physical and mental health. Employees and partners are expected to take personal responsibility for safety by adhering to established guidelines and reporting potential hazards or unsafe practices.

To ensure the highest level of performance and decision-making, employees and partners are prohibited from bringing or consuming drugs or alcohol while working on EITRM or partner premises. Remaining competitive in today's business environment requires clear and unimpaired judgment at all times.

Employees and partners are expected to take personal responsibility for their safety and the safety of those around them by adhering to established guidelines and reporting potential hazards or unsafe practices.

Work-Life Balance

EITRM recognizes the importance of balancing professional responsibilities with personal well-being. We strive to create a flexible and supportive work environment that allows individuals to meet their professional goals while maintaining a fulfilling personal life.

Through initiatives such as flexible working arrangements, mental health support, and family-friendly policies, we empower our team to perform at their best without compromising their personal priorities.

3.2. Interactions with Business Partners

EITRM fosters relationships with its business partners based on transparency, fairness, and mutual respect. These principles ensure that all interactions align with the organization's commitment to ethical practices and sustainability while supporting the raw materials sector's global competitiveness.

Transparent and Fair Relationships

EITRM is committed to maintaining open and equitable relationships with all business partners, including suppliers, contractors, and collaborators. Transparency in communication and decision-making ensures that all parties understand their roles, responsibilities, and expectations.

Fairness guides how EITRM selects and engages with partners, ensuring that opportunities are accessible, and decisions are impartial. All business dealings are conducted in good faith and aligned with applicable legal and ethical standards.

Gifts and Hospitality

To avoid any real or perceived conflicts of interest, EITRM has clear policies governing the acceptance and offering of gifts and hospitality (see the Gifts and Hospitality Guideline). Employees and business partners must refrain from offering or accepting any form of gift or hospitality that could influence, or appear to influence, business decisions.

Acceptable gifts and hospitality are limited to items of nominal value or gestures that comply with local laws and customary business practices. Any offers that fall outside these parameters must be declined and reported to the compliance team.

Selection and Integrity Review of Business Partners

EITRM places a high priority on engaging with partners who share its values of integrity, transparency, and sustainability. A thorough integrity review process is conducted for all potential business partners, ensuring compliance with legal standards and ethical practices.

Partners are expected to uphold the principles outlined in EITRM's Code of Conduct. This includes adherence to environmental and labor regulations, respect for human rights, and a commitment to

responsible business practices. Any partner found to violate these principles may face termination of their engagement with EITRM.

Interactions with Government Officials

Government officials include any individuals working in official roles for local, regional, national, or international government bodies, agencies, or state-owned enterprises. This also extends to individuals representing regulatory authorities or public institutions with oversight responsibilities.

To maintain transparency and ethical conduct in all interactions with government officials, EITRM employees and partners must adhere to the following principles:

- **No Influence**
Avoid offering, giving, or promising anything of value, including gifts, hospitality, or services, to government officials to influence decisions or gain unfair advantages.
- **Transparency in Communications**
Ensure that all communications are clear, factual, and aligned with EITRM's mission and compliance standards. EITRM employees must document all material interactions with high-level government officials, including meeting records, invitations, and sponsorships. Misrepresentation or withholding of critical information is strictly prohibited.

- **Adherence to Local Laws and Regulations**

Understand and comply with all legal requirements governing interactions with government officials in the respective jurisdiction, including reporting obligations and restrictions on lobbying or political contributions.

Employees must report any concerns or uncertainties regarding interactions with government officials to the compliance team or legal counsel to ensure appropriate oversight.

Cross-Border Business

As a multinational organization, EITRM operates in jurisdictions with varying laws and regulations. To ensure compliance and maintain ethical standards in cross-border activities, employees and partners must:

- Ensure payments to agents or distributors are reasonable, documented, and reflect actual services rendered.
- Consult management and legal counsel before expanding business operations into new countries.
- Be vigilant when dealing with countries involved in conflicts or subject to international sanctions.
- Seek legal guidance for cross-border matters, including membership on boards of foreign entities.

As a publicly funded organization, EITRM is committed to diligent spending and transparent tendering processes whenever appropriate, ensuring responsible use of resources in all jurisdictions.

3.3. Handling Resources

EITRM is committed to the responsible use, protection, and management of its resources. This includes financial assets, physical infrastructure, intellectual property, and natural resources. By safeguarding these assets, EITRM ensures long-term sustainability and operational excellence.

Protection of Corporate Resources

EITRM employees, contractors, and partners are entrusted with the organization's resources and are expected to use them responsibly and efficiently. All resources must be used solely for legitimate business purposes and in alignment with EITRM's mission and objectives.

Examples of corporate resources include:

- **Financial Resources:** Budget allocations and expenditures must follow established policies and procedures to ensure accuracy and accountability.
- **Physical Assets:** Equipment, facilities, and tools must be maintained properly and safeguarded against misuse or damage.
- **Digital Assets:** Systems and data must be protected from unauthorized access or cyber threats.

Any misuse or mismanagement of EITRM resources may lead to disciplinary action or other consequences.

Sustainability and Environmental Protection

As a leader in the raw materials sector, EITRM integrates sustainability into all aspects of its operations. Employees and partners are expected to adopt environmentally responsible practices that minimize the organization's ecological footprint.

Key commitments include:

- Reducing waste and promoting recycling initiatives.
- Supporting energy-efficient technologies and processes.

- Encouraging the adoption of circular economy principles across the value chain.

EITRM partners are also required to adhere to these principles, ensuring that collaborative efforts contribute to a more sustainable future.

Protection of Business Secrets and Data

During our activities, EITRM employees, contractors, and partners may be exposed to confidential information, which includes technical data, vendor lists, pricing strategies, non-public financial reports, intellectual property (IP), and trade secrets. This information is a valuable asset that, if improperly disclosed, could harm EITRM, its partners, or provide an unfair advantage to competitors.

To safeguard confidential information and IP rights, the following principles must be adhered to:

- **Confidential Information:** Ensure that sensitive information, such as trade secrets or IP, is only disclosed to authorized persons and only for legitimate business purposes. Exercise care to protect such information, both internally and externally.
- **Protection of IP:** Intellectual property—including patents, copyrights, trademarks, and trade secrets—is protected by law and must not be misused or disclosed without authorization. Any unauthorized use or misappropriation must be reported immediately.
- **Confidentiality Agreements:** Employees and partners must sign confidentiality agreements when required and ensure external parties execute nondisclosure agreements before discussing sensitive information.
- **Secure Discussions:** Be mindful of where and how EITRM's or partners' confidential matters are discussed to avoid inadvertent exposure, particularly in public spaces or unsecured digital platforms.
- **Ethical Competitive Practices:** Gather market or competitive information only in accordance with sound business and ethical principles, ensuring compliance with applicable laws.
- **Unsolicited Offers:** Report and consult with supervisors or compliance team regarding any unsolicited offers of confidential information to determine whether it should be accepted or declined. Particular caution must be exercised if there is any reason to suspect the information was obtained unlawfully.
- **Software Use and Licensing:** Adhere to software copyright and licensing terms, ensuring only legally obtained software is used. Unauthorized duplication of software is strictly prohibited unless explicitly permitted by the license holder.

EITRM's corporate name is among the organization's most valuable assets. Proper protection and use of these assets are essential to maintaining EITRM's reputation and brand value.

3.4. Legal and Ethical Compliance

EITRM is committed to conducting its operations in full compliance with all applicable laws, regulations, and ethical standards. This commitment ensures the organization's integrity and promotes trust with stakeholders across the raw materials sector. Employees, contractors, and partners must adhere to these principles in all activities.

Compliance with Laws and Internal Policies

EITRM requires strict adherence to local, national, and international laws in every country where it operates. In addition, all employees and partners must follow EITRM's internal policies and procedures, which are designed to reinforce legal and ethical compliance.

Employees and partners are expected to:

- Familiarize themselves with the laws and policies relevant to their roles.
- Seek guidance when unsure about the legal implications of specific actions.
- Report any suspected legal or policy violations promptly through the appropriate channels.

Books and records

EITRM upholds the highest standards of financial transparency and accountability. All financial transactions must be accurately recorded and supported by proper documentation. Employees, contractors, and partners are expected to ensure that all records are truthful, clear, and compliant with applicable laws and internal policies.

Key principles include:

- Accurately record all transactions to reflect their true nature.
- Avoid creating or using records to conceal improper activities.
- Ensure timely recording and proper documentation for all financial activities.
- Cooperate fully with internal and external audits, providing required information promptly.
- Report any irregularities or concerns about financial records to a supervisor or the compliance team.

EITRM requires that all contracts be formalized in writing to avoid ambiguity. Side letters or agreements outside the main contract require prior approval from EITRM's compliance team.

By maintaining accurate and transparent records, EITRM ensures trust and accountability in all its operations.

Antitrust and Fair Competition

EITRM is committed to maintaining a fair and competitive marketplace. Employees and partners must not engage in any behavior that could restrict competition or violate antitrust laws. This includes, but is not limited to:

- Price-fixing or collusion with competitors.
- Misuse of market power to exclude competitors.
- Sharing sensitive competitive information with unauthorized parties.

All business dealings must reflect transparency and fairness, ensuring compliance with competition laws.

Prevention of Corruption and Bribery

EITRM has a zero-tolerance policy for corruption and bribery in any form. Employees, contractors, and partners are prohibited from offering, giving, soliciting, or accepting bribes, kickbacks, or other improper advantages. This includes both direct actions and indirect facilitation through third parties.

Examples of prohibited behavior include:

- Offering or accepting monetary payments to secure business advantages.
- Providing lavish gifts or hospitality to influence decision-making.
- Engaging in unethical practices to gain preferential treatment.
- Receiving a kickback from a supplier in the form of a hidden payment or personal benefit for awarding a contract to their company.

EITRM promotes a culture of integrity and requires all stakeholders to act responsibly in every business transaction.

Anti-Money Laundering and Sanctions Compliance

EITRM is committed to preventing its resources and operations from being used for money laundering or other illicit activities. Employees and partners must exercise due diligence to ensure compliance with applicable anti-money laundering (AML) laws and sanctions programs.

Specific obligations include:

- Verifying the identity and legitimacy of business partners.

- Monitoring financial transactions for irregularities.
- Reporting any suspicious activities or transactions to the compliance team.

Prevention of Insider Trading

EITRM employees, contractors, and partners must refrain from buying or selling the securities, products, or raw materials of EITRM's partners while in possession of material non-public information about these partners. Additionally, employees must not disclose such information to others, including family and friends, as this could lead to misuse and legal violations.

"Material non-public information" refers to information that is not publicly available and is significant enough that, if disclosed, it could influence the market price of a partner's securities (e.g., shares or bonds).

Examples of material non-public information include:

- Unpublished financial results, such as unreleased quarterly or annual earnings.
- Major acquisitions or divestitures involving a partner.
- Important contracts that have been signed or terminated.
- Significant changes to a partner's products or services.
- Significant capital projects or alterations to existing capital projects.
- Substantial changes in a partner's senior management or Board of Directors.
- Takeover bids or other change-of-control situations.

Employees and partners must exercise extreme caution when handling sensitive information related to EITRM's partners. Whenever in doubt as to whether trading is permissible, employees should contact EITRM's compliance team for guidance.

Engaging in insider trading or sharing material non-public information is a serious breach of the law, a criminal offense and a violation of EITRM's Code of Conduct. Violations may result in disciplinary action, termination of employment or contracts, and potential legal consequences.

4. Handling Conflicts of Interest

EITRM is committed to maintaining the trust and integrity of its operations by ensuring that all actual, potential, or perceived conflicts of interest are identified, disclosed, and appropriately managed.

Employees, contractors, and partners must prioritize the interests of EITRM over personal or external interests in all professional dealings.

Definition and Examples

A conflict of interest exists where the impartial and objective exercise of the functions of a Board Member, or employee of EITRM, including a member of a management/decision-making body, is compromised for reasons involving family, emotional life, political or national affinity, economic interest, or any other direct or indirect personal interest.

For the purpose of assessing potential or actual conflicts of interest, family members and relatives belonging to the same household or under the care of the members of the household or immediate family (i.e., spouse, partner, parents, dependent family member) shall be considered as close family members.

Examples of conflicts of interest include:

- An employee awarding a contract to a company owned by a family member or close friend.
- Accepting personal benefits from a supplier or partner in exchange for favorable treatment.
- Holding a financial stake in a competitor, supplier, or partner organization.

- Participating in outside activities or employment that could compromise professional judgment or EITRM's reputation.

Independence Criteria

Executive board

At least half of the members — including the chairperson — shall be independent from the EITRM partners. The Executive Board member shall be considered independent if they have not held a management position, strategic advisory position, employment, or equivalent contractual relationship/economic interest with the KIC partner organizations or equivalent entities (i.e., entities that own the EITRM or are part of the EITRM investment portfolio) at present or in the past two years. Similarly, the same applies to their close family members.

EITRM Management

The member of the EITRM management shall be considered independent if they have not held a management position, strategic advisory position, employment, or equivalent contractual relationship/economic interest with the KIC partner organizations or equivalent entities (i.e., entities that own the EITRM or are part of the EITRM investment portfolio). Similarly, the same applies to their close family members.

Disclosure Obligations

Employees, contractors, and partners are required to disclose any actual, potential, or perceived conflicts of interest as soon as they arise. Additionally, all employees must submit an annual conflict of interest disclosure statement. Disclosure must be made via Template (see Annex 1) to a supervisor or the compliance team to ensure proper evaluation and resolution.

The disclosure process is critical to maintaining transparency and safeguarding EITRM's reputation. Failure to disclose conflicts of interest may lead to disciplinary action.

Managing Conflicts of Interest

Once disclosed, EITRM will take appropriate measures to address the conflict, ensuring that decisions are made impartially and without undue influence. Possible steps include:

- Reassigning responsibilities to eliminate potential bias.
- Seeking independent reviews or approvals for decisions related to the conflict.
- Restricting participation in activities where a conflict exists.

Employees and partners are expected to cooperate fully in resolving conflicts and to act in the best interest of EITRM at all times.

External Activities and Investments

Employees and partners must ensure that external activities, such as secondary employment, board memberships, or financial investments, do not conflict with their responsibilities to EITRM. Prior approval may be required for certain external engagements, especially those that involve competitors, suppliers, or partners.

Transparency and accountability in external activities help protect EITRM's integrity and avoid potential reputational risks.

5. Digitalization and Data Management

EITRM recognizes the critical role of digitalization and data in driving innovation, operational efficiency, and informed decision-making. To safeguard these assets and uphold its commitment to transparency and security, EITRM sets forth clear guidelines for the responsible use, protection, and development of digital technologies and data.

Data Protection and Information Security

Protecting personal and organizational data is a top priority for EITRM. Employees, contractors, and partners are expected to handle all data responsibly, ensuring compliance with applicable data protection regulations, including the General Data Protection Regulation (GDPR).

Key responsibilities include:

- Securing data storage and access to prevent unauthorized use or disclosure.
- Reporting data breaches or security incidents immediately to the data protection officer and the compliance team.
- Using organizational data solely for authorized purposes.

EITRM implements robust cybersecurity measures to safeguard its systems and data, ensuring the resilience and integrity of its digital infrastructure.

Use of E-Mail and Internet Systems

EITRM provides e-mail and Internet systems primarily for business use. Employees must exercise the same level of care, caution, and professionalism in e-mail communication as they would in formal written correspondence.

Guidelines for e-mail and Internet usage include:

- Recognizing that e-mails are not entirely secure, can be intercepted, and may create a permanent record that can be forwarded or retained for a substantial period of time.
- Avoiding the use of e-mail for unprofessional, inappropriate, or illegal purposes.
- Ensuring that no unlicensed or unauthorized data is downloaded using the company's Internet connection.

Employees should be aware that their e-mail and Internet usage may be subject to monitoring without prior notice. In case of any uncertainties or technical support needs, employees are encouraged to contact EITRM's IT support team immediately.

Use of Social Media and Communication Channels

EITRM recognizes the growing importance of social media and digital communication in today's business landscape. As an organization committed to impartiality and ethical conduct, EITRM expects employees and partners to refrain from using its resources to support personal or political activities. Additionally, financial integrity is paramount, and employees must ensure that organizational funds are never used for purposes outside EITRM's mission, including political contributions.

Guidelines include:

- Avoid sharing sensitive or proprietary information on public platforms.
- Refrain from making statements or comments that could be perceived as representing EITRM unless explicitly authorized to do so.
- Clearly distinguish personal views from those of EITRM by using disclaimers such as "posts reflect personal opinions only" or similar, when appropriate.
- Do not use EITRM facilities, telephones, or other resources to support or organize political activities, such as staging events or preparing political materials.

- Avoid including political contributions in expense accounts, even if business matters are discussed during the event.

EITRM supports employees' freedom of speech and the right to express personal opinions, including political convictions. However, care must be taken to ensure such expressions are perceived as personal rather than official positions of the organization. Employees should use sound judgment when engaging on social media or participating in political activities and consult their supervisors or the communications team if in doubt.

Development and Use of Technology, Including AI

EITRM is committed to leveraging digital technologies, including artificial intelligence (AI), responsibly and ethically. The organization supports innovation while ensuring that the use of technology aligns with its core values of transparency, fairness, and sustainability. At the same time, EITRM places a strong emphasis on data protection and compliance with applicable laws, including the General Data Protection Regulation (GDPR).

Key Principles include:

- Using AI and other technologies to enhance efficiency and innovation without bias or harm, ensuring that applications respect individual rights and privacy.
- Ensuring that all technologies and systems comply with GDPR and other relevant data protection laws, including secure storage, processing, and sharing of personal and organizational data. Employees and partners must handle data responsibly, safeguarding it against unauthorized access or misuse.
- Ensuring adherence to ethical guidelines and regulatory requirements in the development and deployment of technologies. This includes data minimization, lawful processing, and transparency in the use of digital tools.
- Regularly reviewing and updating technology usage and data protection policies to address emerging challenges, risks, and opportunities in a dynamic digital landscape.
- Safeguarding proprietary and confidential business information in all digital and AI-related operations. Employees must ensure that trade secrets and sensitive organizational data are anonymized or adequately protected before being processed in prompts or shared with any third-party systems.

6. Responsibility for Sustainability

EITRM is deeply committed to fostering sustainability and addressing the environmental, social, and economic challenges of the raw materials sector. As a leader in driving responsible innovation, EITRM integrates sustainable practices into its operations, partnerships, and initiatives to create long-lasting positive impacts.

Respect for Human Rights

EITRM upholds the highest standards for human rights in all its activities and expects the same from its partners, suppliers, and stakeholders. This includes ensuring safe and fair working conditions, prohibiting forced and child labor, and promoting equality and dignity for all.

Key actions include:

- Conducting due diligence to identify and address human rights risks in the supply chain.
- Collaborating with stakeholders to promote labor rights and improve working conditions.
- Requiring partners to adhere to international human rights standards and EITRM's Code of Conduct.

Commitment to Social and Environmental Responsibility

Sustainability is at the core of EITRM's mission. The organization works to minimize its environmental footprint while advancing circular economy principles and resource efficiency. This commitment extends to supporting communities impacted by the raw materials industry.

Key initiatives include:

- Reducing greenhouse gas emissions and energy consumption through innovative solutions.
- Supporting projects that promote recycling, substitution, and sustainable mining practices.
- Partnering with local communities to enhance social well-being and create economic opportunities.

Guidelines for Donations and Sponsorships

EITRM supports initiatives that align with its values and contribute to societal and environmental improvements. Donations and sponsorships are carefully evaluated to ensure they serve legitimate purposes and do not create conflicts of interest or reputational risks.

Guidelines include:

- All sponsorships and donations must be approved in accordance with EITRM's internal policies.
- Financial contributions must not be used to influence business decisions or gain undue advantages.
- Partnerships for sponsored initiatives must align with EITRM's sustainability goals and ethical standards.

7. Implementation and Compliance

EITRM is committed to ensuring that its Code of Conduct is not only a set of principles but a living framework that guides the organization's daily operations and interactions. Effective implementation and consistent compliance with the Code are essential for maintaining integrity, trust, and accountability across all levels of the organization.

Responsibilities of Leadership

Leadership at EITRM plays a crucial role in upholding and enforcing the principles outlined in this Code. Supervisors and executives are expected to lead by example, ensuring that their actions reflect the organization's values.

Key responsibilities include:

- Promoting awareness of the Code among employees and partners.
- Providing guidance and support to ensure adherence to ethical practices.
- Acting decisively to address violations or concerns brought to their attention.

Leaders are accountable for creating an environment where ethical behavior is encouraged, and compliance is a shared responsibility.

Whistleblower System and Reporting Mechanisms

EITRM encourages employees, contractors, and partners to report any suspected violations of the Code, internal policies, or applicable laws. A secure and confidential whistleblower system is in place to facilitate this process without fear of retaliation.

Guidelines for reporting include:

- Reports can be made anonymously through designated channels.
- All reports are treated with confidentiality and investigated promptly by the compliance team.
- Retaliation against whistleblowers is strictly prohibited, and appropriate measures will be taken against those who violate this policy.

EITRM values openness and transparency and ensures that all concerns are addressed thoroughly and impartially.

Consequences for Violations

Violations of the Code of Conduct or related policies will not be tolerated. EITRM will take disciplinary action, up to and including termination of employment or contracts, against individuals or entities found to be in breach of its principles.

Possible consequences include:

- Formal warnings or reprimands.
- Termination of employment or contractual relationships.
- Legal action in cases involving criminal activity or serious misconduct.

By holding all stakeholders accountable, EITRM reinforces its commitment to ethical conduct and organizational integrity.

Support and Training

To ensure that all employees and partners fully understand the Code of Conduct, EITRM provides regular training and resources. These initiatives are designed to:

- Educate stakeholders about the principles and expectations outlined in the Code.
- Strengthen awareness of specific compliance areas, such as anti-corruption and data protection.
- Equip individuals with the knowledge and tools needed to make ethical decisions in complex situations.

Continuous learning and support are vital to embedding the Code into EITRM's organizational culture.

8. Glossary

The glossary provides clear definitions of key terms and concepts used in this Code of Conduct to ensure a shared understanding among all employees, partners, and stakeholders of EITRM.

Business Partner

Any external individual or organization engaged in business activities with EITRM, including suppliers, contractors, consultants, and collaborators.

Circular Economy

An economic model aimed at minimizing waste and maximizing the reuse of resources through recycling, re-manufacturing, and sustainable design.

Code of Conduct

A formal document outlining the ethical principles, behavioral standards, and compliance requirements applicable to EITRM employees, partners, and stakeholders.

Compliance

The act of adhering to laws, regulations, organizational policies, and ethical standards in all business activities.

Conflict of Interest

A situation where an individual's personal or financial interests could interfere, or appear to interfere, with their responsibilities and decision-making on behalf of EITRM.

Confidential Information

Any proprietary, sensitive, or non-public information belonging to EITRM or its stakeholders that must be protected from unauthorized access or disclosure.

Diversity and Inclusion

The practice of creating an environment where individuals from all backgrounds are respected, valued, and provided with equal opportunities to contribute and succeed.

Ethical Behavior

Conduct that reflects integrity, honesty, fairness, and adherence to moral principles, even in challenging or ambiguous situations.

Human Rights

The universal rights and freedoms to which all individuals are entitled, such as equality, freedom from discrimination, and access to fair labor conditions.

Integrity

The quality of being honest, transparent, and consistent in actions and decisions, ensuring alignment with EITRM's values and principles.

Sustainability

The ability to meet the needs of the present without compromising the ability of future generations to meet their needs, achieved through responsible environmental, social, and economic practices.

Whistleblower

An individual who reports misconduct, violations of the Code, or unlawful activities within EITRM, often through confidential or anonymous mechanisms.

This glossary is intended to provide clarity and consistency in understanding the terms referenced throughout this Code. It serves as a resource for all employees and partners to ensure alignment with EITRM's principles and policies.

Referencing Documents

- Policy on Gifts and Invitations
- Diversity and Inclusion Policy
- Procurement Policy
- Whistleblower Policy
- Anti Fraud Policy