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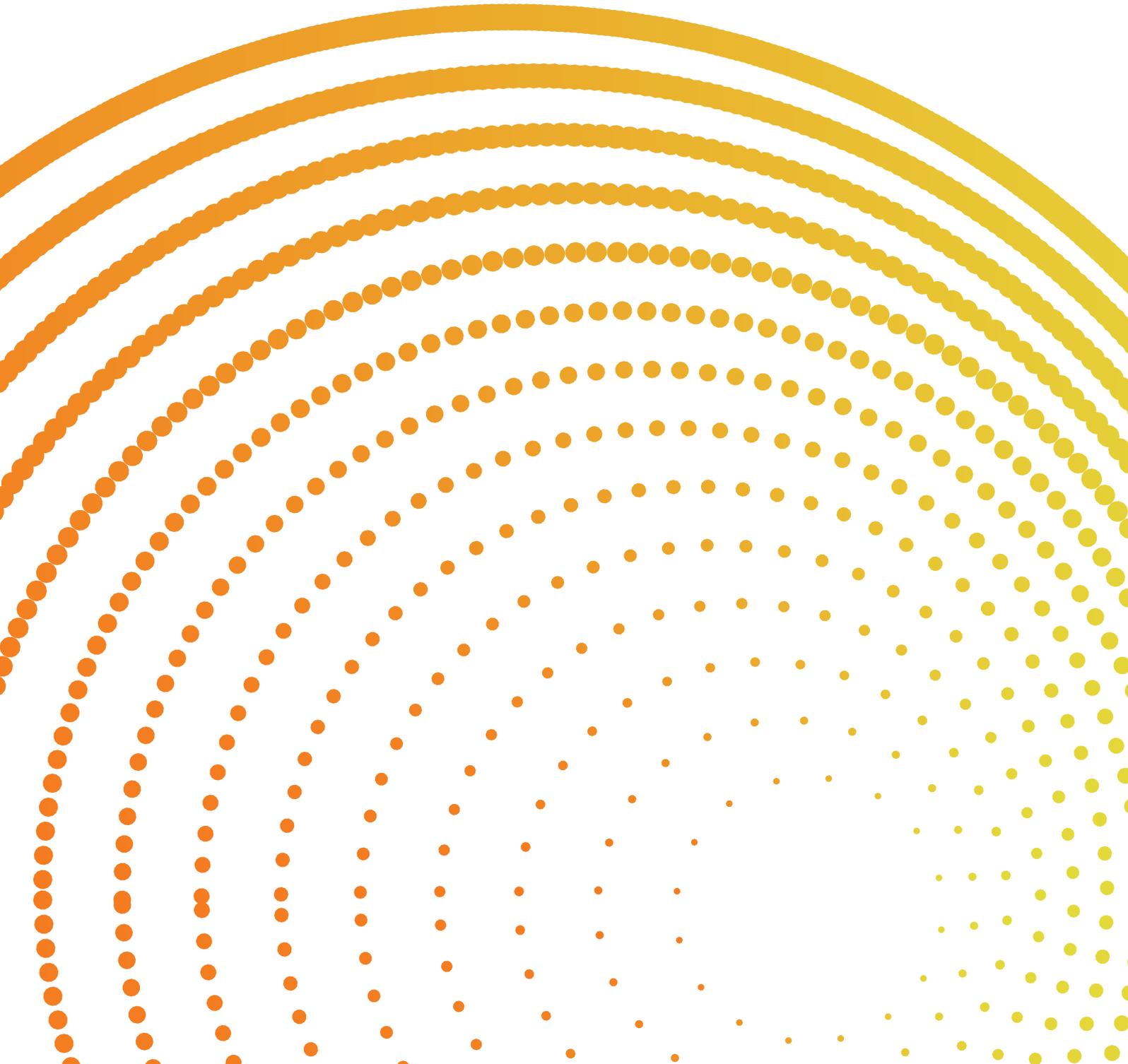
# Fair Trading Policy 2022



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Molycop Legal

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## Fair Trading Policy

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In this Fair Trading Policy, Molycop means any company or business within the Molycop group of companies and businesses, including any other companies and businesses that may be acquired by or form part of the Molycop group from time to time.

Molycop does not tolerate and will not knowingly participate in activity involving modern slavery or human trafficking. Molycop is committed to conducting business ethically and with integrity and ensuring there is no slavery or human trafficking in any part of its business.

Molycop is committed to a pro-competitive culture, and compliance with the trade practices laws of all countries in which it operates. Compliance with these laws also promotes ethical standards and a commitment to free and fair competition.

**Specifically:**

- All employees must ensure that, for their part, they comply with this Policy
- Conduct which is prohibited by competition, anti-trust, fair trading and trade practices laws in each country where Molycop operates must be avoided. Most importantly:
  - any pricing or other decision that affects competition in the market place will be reached by Molycop without collusion with any competitor; and
  - Molycop will not participate in unfair or oppressive practices or mislead or deceive by either falsifying or wrongly withholding information or making any untruthful remark about Molycop, its competitors, their products or services
- Where the impact of the law is uncertain, employees must seek appropriate legal advice or consult with the Molycop Chief Legal Officer and act on an informed judgment
- No employee has authority to contravene this policy or to authorise or condone contravention by others. Contravention cannot be justified by claims of ignorance, good intentions or failure to seek legal advice and will be regarded as a serious breach of your responsibilities and duties as an employee. Disciplinary action will be taken internally against employees who are knowingly or recklessly involved in a contravention of this Policy or the competition, anti-trust, fair trading or trade practices laws of any country in which Molycop operates. Molycop will not indemnify staff involved in a contravention
- Molycop is committed to investigating and responding to any potential trade practices compliance breaches or complaints, promptly and in a fair and unbiased fashion
- Any employee becoming aware of a breach or potential breach of this policy should report any concerns to the Chief Legal Officer
- Molycop will continue to conduct employee education and compliance programs on a regular basis to help ensure the success of this policy
- Molycop intends to promote a co-operative relationship with relevant regulatory agencies in countries where it operates.



**Jim Anderson**

Chief Executive Officer  
August 2023



[molycop.com](https://molycop.com)

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