

Code of Conduct

The Way We Progress Together

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WE SHARE A COMMON GOAL

Ensuring sustainable progress

At Molycop, we believe in conducting business with integrity, transparency, and respect for all. Our Code of Conduct provides clear guidelines on how to interact both internally and externally, ensuring that ethical decision making shapes our path.

SECTION I

Code Introduction

In this section, you'll find an overview of Molycop's shared values, and some information on how to uphold them. Here are the specific areas we'll be covering.

In this section

[A Message From Our CEO](#) | [Our Purpose and Values](#) | [Your Responsibility](#) | [Speaking Up](#)

A Message From Our CEO

Jim Anderson reflects on the vital role our Code of Conduct plays in supporting and guiding everyone at Molycop, emphasising its importance in maintaining our values and standards.

At Molycop, we collaborate closely with our customers, communities, employees and suppliers to foster sustainable mining and secure a better future for all.

Our enduring success over the last century is built on a foundation of integrity, reliability, resilience, innovation and ethical behavior. These principles shape our interactions with customers, communities, employees, suppliers, and governments, and are embodied in our Code of Conduct. This Code guides us in maintaining and upholding the integrity of our actions, enabling us to maintain stakeholder trust.

We hold not only ourselves but also our suppliers and partners to these high standards, creating a collaborative, safe and productive environment grounded in shared values.

As a member of the Molycop team, you may encounter challenging situations. In these situations, our Code of Conduct will be your guide. It aims to foster a respectful and integrity-driven workplace, encouraging you to speak up if our values are compromised. If a concern is raised, we will collectively ensure that any concerns are addressed promptly, confidentially and justly.

Please familiarise yourself with our Code of Conduct to fully understand its implications for your role, your obligations and how you represent Molycop. Thank you for your commitment to the ethical standards and culture that define our organization.



Jim Anderson
Chief Executive Officer



Our Values

At Molycop, we work with our partners and communities to ensure the sustainability of our industry and a better future for society.

Together, we’re pushing possibilities by constantly innovating to develop new products and services that drive efficiencies for the extraction of essential elements for the modern world. With a proven track record, our dedication to quality and deep understanding of customer needs consistently delivers reliability and support. Investors recognize our capacity for real, sustainable advancements in this dynamic industry.

The communities we serve value our efforts to make a positive contribution to the environment and society.

Let’s make Progress Together.



Work Collaboratively

We thrive on teamwork and believe challenges are best overcome through unified efforts. By working together, we achieve shared goals.



Deliver Expertly

Known for our reliability, honesty, and expertise, we provide services that our customers trust. Our commitment to excellence ensures our enduring presence and future relevance.



Innovate Positively

We continuously explore and implement innovative solutions to enhance the productivity, efficiency, and sustainability of the industries in which we operate.



Act Responsibly

We are strictly committed to ensuring the safety and wellbeing of ourselves, others and our planet.

Your responsibility

At Molycop, we believe in conducting business with integrity, transparency and respect for all our valued stakeholders. This Code provides clear guidelines on how to interact internally and externally, ensuring that ethical decision-making guides our path.

Some helpful questions to ask yourself are:

- 1. Is my behavior in line with my company's values, goals and code of conduct?
- 2. Does it feel like the 'right' thing to do?
- 3. What are the likely outcomes for:
 - My business
 - My colleagues
 - Customers
 - Me?
- 4. Can I justify my decision or action?
- 5. Would my decision or action stand up to public or internal scrutiny?
If not, then don't act.

If you require assistance in understanding or implementing our Code of Conduct, please consult with your Manager, HR or Legal and Compliance departments for guidance.



1. Understand and Follow the Code

Everyone at Molycop is expected to thoroughly understand and practice the requirements in our Code of Conduct.



2. Continuously Learn

The ethical landscape of Molycop continually evolves, therefore it's important to keep up with any changes made to the Code of Conduct, plus participate in training programs and stay informed about relevant legal and ethical guidelines in your role.



3. Speak Up

Speaking up promptly about violations of the Code of Conduct is not just encouraged, it's essential. Our workplace is somewhere you should feel safe and confident to raise concerns privately without fear of retaliation.



4. Build Trust

We foster openness, transparency and honesty. We don't make promises we cannot keep and when mistakes occur, we address them sincerely and promptly.



5. Comply with Laws

It is essential for all of us to understand and comply with the laws and regulations relevant to our work.



6. Lead by example

We all have a responsibility to role model the requirements expected under our Code. Equally important, is our role in never accepting actions and behaviors, inconsistent with our Code.



Speaking up

At Molycop, we are committed to a culture that encourages speaking up. This commitment safeguards our people and our business, and improves the way we work together.

To us, ignoring wrongdoing in the workplace is no different to condoning it. In some cases, it may even implicate us. If you are ever in a situation where you witness any conduct that contradicts our Code of Conduct, please report it immediately through our Ethics and Integrity Channel. We are committed to objectivity, confidentiality, and fairness in handling these matters.

We aim to uphold the highest standards of conduct in all our business dealings, promoting honesty, ethical behavior and strong corporate governance.

For more information please check:

- Go to our Ethics and Integrity Channel: <https://molycop.trusty.report/>
- Contact your HR representative or Molycop’s Legal and Compliance department.
- Reach out to your direct manager or supervisor.

Ethics & Integrity Channel

The Ethics & Integrity Channel <https://molycop.trusty.report/> is the recommended option to report improper conduct of a Molycop employee or representative. Anyone who reports in good faith improper conduct will not be subject to retaliation, retribution or other recriminations.

How does this work?

1	2	3	4	5
You suspect or have certainty that there is a potential violation of the Code of Conduct or other misconduct.	You report through official channels, use our Ethics & Integrity Channel or: <ul style="list-style-type: none">• Your Manager or Manager’s Manager• Global Compliance Manager• Chief Legal Officer/ Legal Department• HR Department.	After receiving your report, we will handle it following our internal procedures.	The company will respond as quickly as possible to progress the process.	You will be updated during the course of the process and advised of next steps.



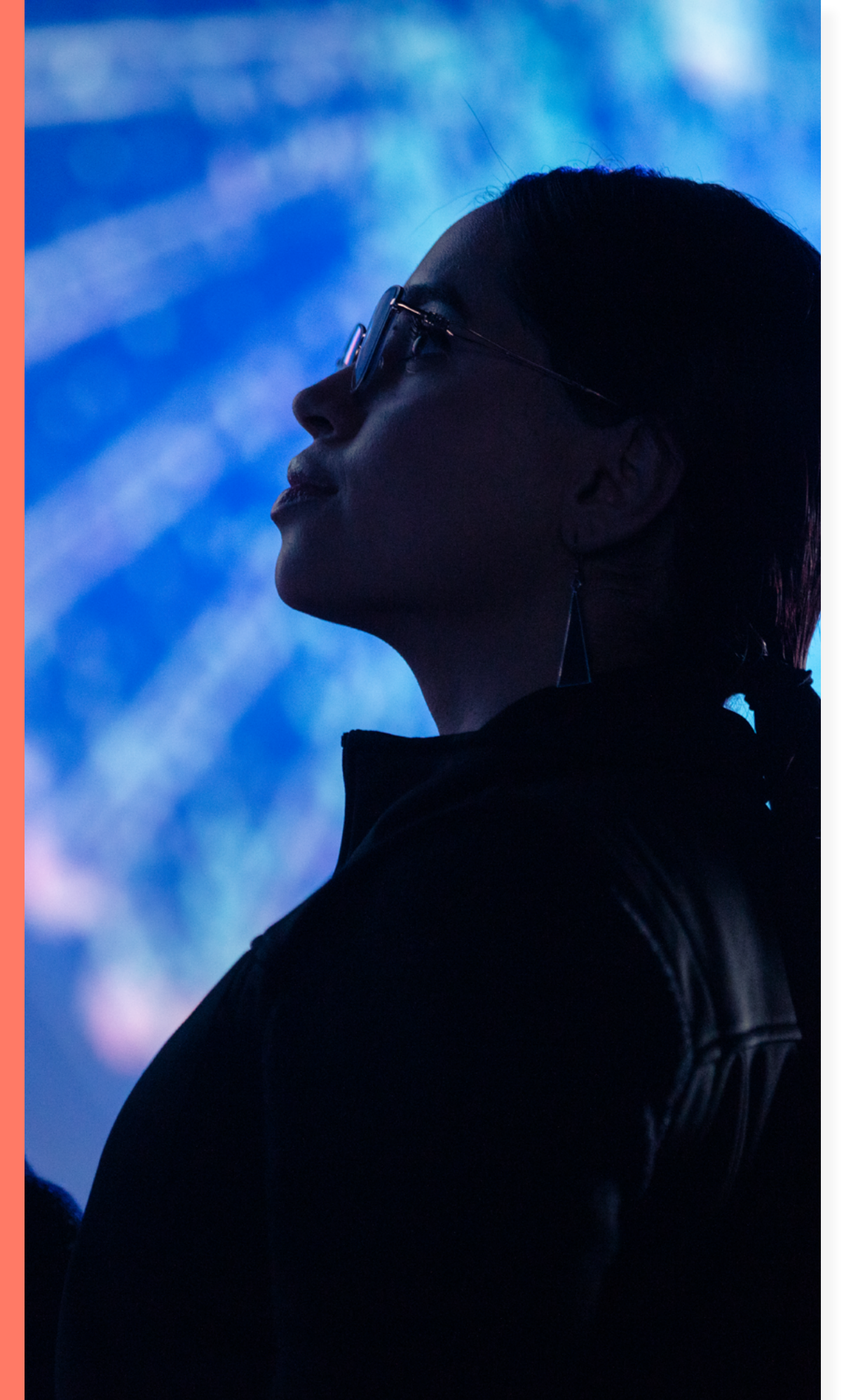
Speaking up

In Molycop we do...

- Encourage individuals to report any incidents or concerns without hesitation.
- Quickly respond to concerns raised.
- Stand against any retaliatory behavior towards individuals who have spoken out about an incident or concern.
- Respect the confidentiality of the investigation.
- Cooperate fully with investigators and provide any requested information or assistance.
- Trust the integrity and impartiality of the investigation.
- Allow the process to unfold without interference or attempts to influence the outcome.
- Have patience and understanding, as investigations can take time to reach a resolution.

In Molycop we don't...

- Participate in any actions that could be perceived as retaliatory.
- Ignore or neglect to address any patterns or systemic issues that may be revealed through the reporting process.
- Report a situation solely to harm someone.
- Spread rumors or make unfounded accusations.
- Withhold information or manipulate facts to misrepresent the situation.
- Engage in biased or discriminatory behavior when reporting or investigating misconduct.
- Hesitate to report due to fear of reprisal.
- Discourage or intimidate individuals from reporting incidents or concerns.



SECTION 2

Getting Home Safely is everyone's priority

In this section, we delve into Molycop's safety protocols and the individual responsibilities required to uphold them. We will examine the following key areas:

In this section

[Our Safety Principles](#) | [Your Obligations](#) | [Q&A](#)

Our Safety Principles

At Molycop, we recognize the risks involved in our line of work. This means that we adopt an unwavering commitment to the safety of each other. Our ‘Goal Zero’ approach puts this attitude into practice, where we require all stakeholders to identify hazards, develop controls, engage in training, and monitor progress constantly. Additionally, we’re dedicated to raising mental health awareness and providing necessary support to ensure the well-being of everyone involved.

Safety is the responsibility of every employee, not just managers. Each individual is expected to lead by example, ensuring not only their own safety but also that of their colleagues. If you identify a potential safety hazard, it is your duty to take immediate action and stop any activity that puts yourself or others in harm’s way. Don’t hesitate—safety comes first!

There is no more important reflection of our values in action than the protection of all who work at and with Molycop.

Getting every employee and contractor home safely is everyone’s priority.

Molycop Safety Principles (WEMATA):



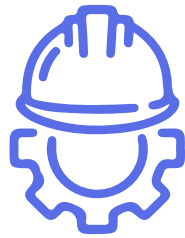
Working safely is a condition of employment

- Everyone is responsible for their own safety and the safety of their workmates
- We cannot and will not accept unsafe practices
- Everyone will comply with safety procedures and rules
- Poor safety attitude and behavior will not be tolerated



All injuries can be prevented

- This principle underpins Goal Zero
- It is about having the belief that all incidents are preventable
- We will do everything we can to prevent any injuries
- All incidents will be rigorously investigated to prevent a recurrence



Employee involvement is essential

- To have a safe workplace everyone must be involved
- Everyone must ‘own’ the safety program
- Everyone has a role to play - for example: audits housekeeping and safety committees
- Excellent safety is achieved through everyone’s contribution



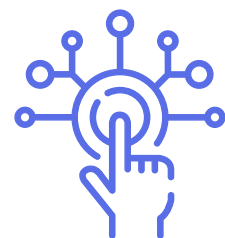
Training employees to work safely is essential

- To ensure safety from day one, employment will commence with a safety induction
- To ensure everyone understands the hazards, safeguards, and safety systems
- To enable everyone to perform their tasks safely according to operating procedures
- To ensure rules and procedures are understood
- Leaders/Managers to ensure that their team are trained and competent to undertake the work that they are assigned



Management is accountable for safety

- Provide and maintain safe plant and equipment
- Provide a safe environment
- Provide safe work systems
- Provide required information, training and supervision



All operating exposures can be safeguarded

- Known hazards will be reduced to a safe level or eliminated
- Procedures for safe work will be developed and implemented
- Personal protective equipment will be provided and utilized
- Safety will be regularly audited

Our Commitment

Molycop’s ambition is to be world class in safety. We are committed to providing a safe and healthy workplace for every individual involved in our operations. Through organizational leadership, continuous improvement, education, and vigilance we strive to prevent incidents, protect lives and uphold the highest safety standards.

Our goal is to collectively design safe systems of work, which are effectively communicated and deployed, monitored and measured.

We expect everyone working for and with Molycop to:

- 1. Follow our safety controls
- 2. Look out for one another
- 3. Ensure you are fit for work
- 4. Always stop work that is unsafe.



What We Need You To Do:

- You are responsible for carrying out your duties in a safe manner, whilst observing and adhering to established policies and safe working practices of the Company.
- You are responsible for ensuring you present to work fit and able to work safely.
- Never bring, use or come to site impaired by alcohol and other drugs.
- Where permitted by law you may be required to participate in periodic assessments under our ‘fit for work’ programs including drug and alcohol monitoring.
- Tell your manager if you are taking medications that could impact your ability to work safely.
- Only smoke in designated smoking areas.
- Be alert to hazards and protect yourself from physical harm while at work, or when traveling for work, by following our operating procedures and applying our risk assessment tools and controls.
- If equipment is not functioning safely, immediately cease using it and report the issue to your Supervisor or Manager.
- Understand and follow the requirements of the Molycop Codes of Practice - these are critical controls and standards designed to manage significant risk across our business.



Committed to Goal Zero



Q&A on Safety:

What would you do?
Here are some scenarios you could find yourself in.

Scenario 1:

I drive a forklift and I am using over the counter or prescribed medication. What should I do?

You should review the medication labelling, and where prescribed, discuss with your doctor your work duties to understand if the medication could impair your ability to perform your normal duties at work. If there is a concern, your doctor will need to provide you with a doctor’s certificate or letter outlining restrictions. For all medications you should advise your Manager or Supervisor where the medication may impact on or restrict your ability to perform normal duties. This should be a confidential conversation, and you do not need to disclose what the medication is or what it is for.

Together, we will determine a plan of action including aligning to your doctors’ restrictions where relevant.

Scenario 2:

I am having a work function which is serving alcohol and I need to return to the office?

Molycop has a zero-tolerance policy of entering any site having consumed or under the influence of alcohol or other drugs. If you are attending a work function and you need to return to the office, you should not consume alcohol at the function.

Scenario 3:

You have been assigned a task where you don’t feel that your training is sufficient to complete the job safely or properly.

One of Molycop’s six safety principles is “Training employees to work safely is essential”. All employees must receive training to enable them to perform their tasks safely and in accordance with relevant operating procedures. If you feel that you have not received adequate training or your trained competence has declined on the basis you have not performed the task for an extended period, don’t start or continue with the task until you speak with your immediate supervisor or manager and determine the appropriate path forward.

Scenario 4:

I have had a significant event in my life that is impacting my mental health.

Molycop recognizes that mental health, the often-unseen injury and illness, is an important part of our safety culture and environment. Advise your Manager or Supervisor in a safe and confidential environment of any personal concerns you may be dealing with that are affecting your mental health and may be causing you undue stress, distracting your attention and/or may affect your capacity to perform your duties at work. Remember a problem shared is a problem halved and we can make the appropriate decision on the type of work you should be assigned and may be able assist you or point you in the right direction to get assistance including access to an Employee Assistance Program (EAP).



SECTION 3

We respect and value our people, community and planet

In this section, we explore how respect and integrity are manifested in our interactions with people and our approach to the environment. We will cover the following key areas:

In this section

People | Community | Planet

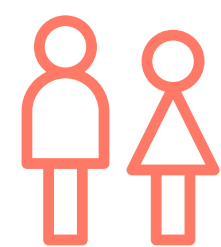
People, Community and the Planet

At Molycop, our people are our greatest resource. That’s why we strive to create an environment where everyone feels valued, can openly express their opinions, and are driven by clear purpose and direction.

Being closely integrated into the communities where we operate is key to Molycop’s value proposition. For decades, our presence in local communities has been based on trust and built through inclusive and honest engagements. We are committed to operating responsibly, contributing positively to society, and enhancing environmental sustainability. This includes upholding human rights, advancing decarbonization efforts, and continuous improvement in operations to support community prosperity and equitable societal progress.

Our principles underpin the strength and integrity of our company, they define what we stand for and who we are.

People, Community & Planet Principles:



Ensures that employees receive appropriate remuneration, meeting our statutory obligations. Additionally, we believe in the principle of fair compensation for work of comparable value, irrespective of gender.



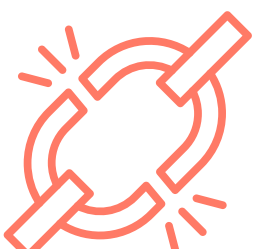
Recognizes the rights of employees to form or join trade unions and engage in collective bargaining.



Ensures it complies with the minimum and maximum working hours prescribed in each country that we operate.



Values the importance of indigenous cultural heritage, and our natural flora and fauna, always taking steps to ensure its protection.



Has zero tolerance for modern slavery, child labour and human trafficking and never knowingly engages in business activities where human rights are breached.



Accept the science of climate change and support the central goal of the 2015 Paris Accord to limit temperature rise.

Our People

Molycop is dedicated to fostering a diverse, skilled and committed workforce through contemporary employment practices and arrangements. We are committed to maintaining workplaces that are free from harassment, discrimination and bullying, and ensure equal opportunities and treatment for all.



What We Need You To Do:

- Ensure fair and respectful treatment of all individuals.
- Never discriminate and treat someone less favorably due to their ethnicity, gender, background or other factors unrelated to their work performance.
- Never behave in a way that offends, intimidates, degrades, insults or humiliates others. Bullying behavior will not be tolerated.
- Remove and report any offensive material found on our sites and do not distribute it.
- Speak-up if you witness or experience inappropriate behavior.
- Conduct appropriate due diligence for any third parties you engage to verify their alignment with our Code of Conduct.
- Continuously explore and learn perspectives that may be different from yours.
- Promote understanding of rights and responsibilities regarding discrimination, harassment, and bullying.
- Take complaints seriously, and report any deviation detected immediately.
- Complying with equal employment opportunity (EEO) standards and effectively managing diversity, harassment, and bullying.



Community

It's important that we build and maintain relationships with the communities in which we operate. This involves establishing a transparent, respectful and responsive approach to community engagement, minimizing our negative impacts and actively looking for ways to create social value.



What We Need You To Do:

- Immediately report any incident that may negatively impact, or risk the safety of the community.
- Be approachable and responsive when receiving concerns from the community.
- When sponsoring community events and groups, focus our contributions on opportunities that improve health, education, support the disadvantaged, and enhance cultural, sporting and environmental causes.
- Always gain the necessary approvals before committing Molycop to any community sponsorship arrangements and ensure the responsible manager registers any sponsorships or donations.
- Where feasible, incorporate local sourcing opportunities into procurement strategies.



Planet

We understand that we play an important part in the process of liberating minerals critical for the world’s transition to a low carbon economy.

We are also aiming to reduce the footprint of our own operations through technology and innovation.

At Molycop, we take our responsibility to do better for the future seriously, and we believe this point of difference enables Molycop to prosper in a low carbon economy.



What We Need You To Do:

- Understand and operate in accordance with business license and regulatory obligations.
- Stop any work that may have an unintended impact on the environment.
- Report all loss of containment incidents where there may be an environmental impact.
- Always satisfy your regulator reporting obligations.
- Always look for opportunities to use scarce resources more efficiently and responsibly.
- Look for opportunities to improve our environmental performance and reduce our impact on the planet.



People, Community & Planet



Q&A on People, Community & Planet:

What would you do?
Here are some scenarios you could find yourself in.

Scenario 1: People

A team member confides that a coworker has been sending inappropriate pictures via text. The team member is very uncomfortable with the pictures and the coworker. What should you do?

Encourage the team member to report the incident to HR or use the Ethics & Integrity Channel. If you are the team members' manager, you are obligated to report the incident to HR.

Scenario 2: Community

Molycop plans to expand operations near a small town. Before construction begins, Luis, the project manager, holds a town hall meeting to address residents' concerns. He listens to feedback on noise and traffic, explains mitigation plans, and highlights Molycop's commitment to local hiring and community support, demonstrating the company's dedication to positive social impact.

Building and maintaining community relationships means engaging with transparency, respect, and responsiveness. By actively minimizing negative impacts and contributing to local initiatives, we create meaningful social value in the communities where we operate.

Scenario 3: Planet

A team member identifies that their ongoing activities may be unintentionally affecting a nearby water source, potentially causing pollution and environmental damage.

You must immediately suspend all work to prevent any further potential pollution. Promptly notify the responsible manager to ensure appropriate actions are taken including determining if the notifying the regulator is required.



SECTION 4

We are proud of doing what's right, not what's easy

In this section, we outline the fundamental role of integrity in our operations at Molycop. We'll explore how acting ethically governs our interactions and compliance within various areas of our business. The topics we'll cover include:

In this section

Acting Responsibly | Compliance With Trade Controls | Respect for Government | Fraud, Bribery and Corruption | Conflicts of Interest | Gifts and Hospitality | Money Laundering and Terrorist Financing | External Relations

Acting Responsibly

At Molycop, we’re committed to conducting our business with integrity, accountability, and respect for all stakeholders. This means adhering to all relevant laws and regulations, maintaining transparency in our dealings, and making decisions that reflect our dedication to ethical practices. Each employee is expected to act with honesty and fairness, ensuring their actions do not harm themselves, others, or the company’s reputation, and uphold the highest standards of professionalism in every interaction. By embracing these principles, we contribute to a positive work environment and reinforce our commitment to responsible corporate citizenship.

For more information please check:

- Use our Ethics & Integrity Channel for reporting any deviations.
- Contact your HR representative or Molycop’s Legal and Compliance department.
- Reach out to your direct manager or supervisor.
- Review our Third Party Due Diligence Policy.

Compliance with laws and regulations

It is every employee’s responsibility to ensure that they fully understand all laws and regulations relevant to their role. The laws that govern Molycop’s business activities may be complex, however, ignorance of the law does not excuse Molycop or its employees from their obligation to comply.

Outside appointments

Employees must seek approval from Senior Management before accepting a position, paid or otherwise, in government advisory bodies; political parties; professional institutions; trade associations; charitable, public, social or sporting organizations whilst being employed by Molycop. Each application will be considered on its merits.

Whenever an employee participates in an outside activity, it is their responsibility to ensure that any opinions expressed are clearly their personal views, not the views of Molycop.

Sanctions

Molycop and its employees can be held liable if Molycop engages directly or indirectly in certain transactions with third parties which are subject to sanctions and other measures issued by government authorities. Molycop is committed to conducting business in compliance with all sanctions laws.

Fair Competition

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

Relationships with government

Wherever Molycop conducts business, it respects the authority of government. Molycop will maintain honest relationships with governments, their agencies, officials, and personnel. Molycop regularly shares information and opinions with government on issues that affect Molycop. The exchange of information and opinions is essential to informed decision making by both government officials and Molycop.

Employees who provide information to governments on behalf of Molycop must ensure that all information is accurate and complete. Errors or omissions may be construed as a violation of a law or regulation and might damage Molycop’s credibility and reputation. Employees who acts on behalf of Molycop on or represent Molycop in government matters must comply with all applicable laws and regulations relating to corporate participation in public affairs.

Political contributions and activities

Molycop maintains a position of impartiality with respect to party politics. Accordingly, Molycop does not contribute funds to any political party, politician or candidate for elected public office in any country.

Molycop may contribute to the public debate of policy issues that affect it. For example, Molycop might discuss relevant issues with government officials or provide written advice about the likely impact of proposed policies on Molycop. At times, attendance at events hosted by a political party may be required for briefing purposes. Your manager must be consulted if there is any doubt about whether attendance at a function would compromise Molycop’s impartiality.



Compliance with trade controls

Molycop is committed to a pro-competitive culture and compliance with competition, antitrust and trade practice laws of all countries in which it operates or conducts business.

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.

For more information please check:

- Fair Trading Policy.
- Contact your Legal & Compliance Department.



Your Obligations:

- Be fair, open and honest in all business dealings.
- Never misrepresent Molycop’s products, services, pricing, or make false claims about competitors or suppliers.
- Make all purchasing decisions on commercial factors including quality, price, service, reputation and reliability.
- Always protect and respect confidential information that is obtained through a business relationship.
- Avoid involvement and report any conduct that is prohibited by competition, antitrust or trade practice laws to the Chief Legal Officer.



Respect for Governments

Wherever Molycop conducts business, it respects the authority of government and will always maintain honest relationships with governments, their agencies, officials, and personnel.

Officials may include, but are not limited to:

- Employees or contractors of companies owned by government
- A person in the service of a government body including a member of the military or police force
- A politician, judge or member of the legislature of a country
- An employee, contractor or person otherwise in the service of a public international organization
- An individual who is or who holds themselves out to be an authorised intermediary of a public official

For more information please check:

- Fraud and Corruption Policy
- Corporate Credit Card, Travel and Entertainment Policy
- Contact your Legal & Compliance Department



Your Obligations:

- Never offer, promise, authorise or provide anything of value to any public official in order to influence the official for the purpose of obtaining or retaining business advantage for Molycop.
- Never offer any benefit to a third person (such as a relative or business partner of the public official) with the intention of influencing the official.
- Never offer or provide a benefit or ‘secret commission’ to any agent or representative of another person or company in order to obtain a business advantage for Molycop.
- Molycop maintains a position of impartiality with respect to party politics. Accordingly, Molycop does not contribute funds to any political party, politician or candidate for elected public office in any country.



Gifts and Hospitality

Molycop accepts that gifts and hospitality including entertainment is part of developing business relationships; however, they must be given and received without obligation, be reasonable in cost and consistent with our values.

Molycop does not permit or tolerate giving or taking bribes, kickbacks, gratuities or any other payments or promises for favorable treatment or as an inducement for doing business.

Accepting or offering gifts of moderate value (as a guideline, circa USD100 or equivalent value) is acceptable in situations where it is legal and in accordance with normal business practice such as where the exchange of gifts is customary and the gifts are appropriate for the occasion.

For more information please check:

- Fair Trading Policy
- Corporate Credit Card, Travel and Entertainment Policy
- Contact your HR and Legal & Compliance Departments



Your Obligations:

- Anything of value that is offered, given or received must be for legitimate business purposes and comply with the givers and receivers policies.
- Familiarize yourself with the value limits on gifts and hospitality for your country under Molycop policy. Gifts should never be in cash or cash equivalents such as vouchers or credit notes.
- Obtain approval wherever gifts or hospitality exceeds policy standards.
- Refuse gifts or entertainment designed to influence commercial decisions.
- Never accept gifts or hospitality when negotiation is underway or could be seen to influence a decision.
- Never provide gifts or hospitality that could be considered inconsistent with our values.



Fraud, Bribery and Corruption

Fraud, bribery, and corruption are unethical and unlawful practices that undermine the integrity of our company. Fraud, bribery and corruption can affect not only our internal operations but also our relationships with all stakeholders. We have an unwavering commitment to ethical conduct and lawful behavior which is paramount to maintaining a thriving, reputable business.

Molycop strictly prohibits any individual or group representing the company for engaging in any fraud, bribery or corrupt practices.

Remember that your risk increases if you are working with public officials and can increase depending upon your role, such as a sales representative.

Molycop and its employees risk criminal charges if they partake in or conceal profits from bribery, corruption or fraudulent activities, or if they manipulate company financial records to hide these transactions.

For more information please check:

- Fraud and Corruption Policy
- Corporate Credit Card, Travel and Entertainment Policy
- Contact your Legal & Compliance Department



Your Obligations:

- Never participate in fraudulent and corrupt activities.
- Never promise, give, approve or provide anything of value, directly or otherwise to any stakeholder to influence their decision towards Molycop.
- Never knowingly provide false or misleading information.
- Always ensure that personal claims for payment from Molycop are justified and validated.
- Always ensure that the use of Molycop supplied equipment is used in a lawful and authorised manner.



Conflicts of Interest

Molycop’s recognizes that the potential for conflicts of interest is a business reality. Our clear position is that all business dealings are at ‘arm’s length’ and impartial.

For more information please check:

- Fair Trading Policy
- Contact your Legal & Compliance Department



Your Obligations:

- Always make business decisions in the best interest of Molycop.
- Do not execute private orders from companies where Molycop has business dealings and you personally derive advantage.
- Do not give or accept gifts of any kind in circumstances that could be reasonably regarded as unduly or improperly influencing the recipient.
- Even the appearance of a conflict can be damaging; when in doubt, contact the Legal & Compliance Department for guidance.



Money Laundering and Terrorist Financing

Trading and delivery transactions carry the risk of being misused for money laundering or terrorist financing. To avoid this, Molycop takes a proactive risk-based approach to commercial transactions by conducting business only with reputable customers, partners and other companies that are involved in lawful business activities and derive their funds from legitimate sources.

For more information please check:

- Fair Trading Policy
- Third Party Due Diligence Policy
- Contact your Legal & Compliance Department



Your Obligations:

- Always check the identity of the customers, distributors, sales representatives and any other third parties, their economic background and the origin of payments from legitimate sources.
- When you are trading in high risk regions, apply additional due diligence investigations of customers and suppliers.



We Are Proud of Doing What's Right



Q&A on Doing What's Right:

What would you do?
Here are some scenarios you could find yourself in.

Acting Responsibly:

An employee in the finance department notices a small error in a financial report that was already submitted to senior management. The mistake is minor and unlikely to be noticed, but it could impact future decisions if left uncorrected.

Instead of ignoring the error to avoid extra work or potential scrutiny, immediately inform your supervisor of the error and follow the procedures outlined by your supervisor.

Compliance With Trade Controls:

Emma, a new sales manager at Molycop, considers using old pricing documents from her previous employer to gain insight into competitor strategies for an upcoming bid. Remembering Molycop's strict compliance with trade controls, she consults the Legal & Compliance Department, who remind her that using a competitor's confidential information is prohibited and poses legal and ethical risks. Following their guidance, Emma decides against using the documents and relies on Molycop's internal data for the bid preparation.

At Molycop, we maintain strict compliance with trade controls and ethical standards. Bringing or using any confidential documents from competitors, including pricing information, is strictly prohibited. Employees should rely on internal resources and market analysis instead and consult Legal & Compliance Department if unsure.

Respect for Governments:

During a routine inspection by a local environmental regulatory agency, Molycop was asked for additional documentation related to its waste disposal practices. The company identified a minor oversight in its environmental data reporting.

Molycop should immediately provide the necessary documentation requested by the agency, explain the error and corrective actions.

Gifts & Hospitality:

During the holidays, an employee in the procurement department receives an expensive luxury designer gift from a potential supplier. What should you do?

Employee must not accept the gift; politely decline and report the matter to the Legal & Compliance Department.

We Are Proud of Doing What's Right



Q&A on Doing What's Right:

What would you do?

Here are some scenarios you
could find yourself in.

Fraud, Bribery and Corruption

You are traveling to a region where it is customary for you to bring gifts to those you are visiting. What should you do?

Make sure your gift is of nominal value; if you are meeting with public or government officials, contact your Legal & Compliance department before presenting any gifts.

Conflicts of Interest:

James, who works in Molycop's finance department, learns that his sister has applied for a position in the company's marketing team. What should James be aware of in this situation?

At Molycop, we encourage personal recommendations for open roles. However, if a family member applies, you must disclose the relationship if there's a reporting line or if you're involved in the selection process. To ensure fairness, always inform HR of any connections and remove yourself from hiring decisions where a conflict could arise.

Money Laundering and Terrorist Financing:

While engaging a new customer, Molycop's compliance team identified several red flags during the due diligence process, including an unclear ownership structure and financial discrepancies. Further investigation uncovered links to regions associated with high-risk activities, such as money laundering and terrorist financing.

Molycop should pause the transaction to complete a more thorough investigation of the potential new customer to assess any risks of engaging with them.



SECTION 5

Protecting Our Business and Reputation

In this section, we'll discuss the critical importance of safeguarding Molycop's reputation and the specific measures necessary to protect it. Here are the specific areas we'll cover:

In this section

Our Assets and Maintaining Accurate Records | Our Brand, Reputation and Intellectual Property Rights | Our Technology, Systems and Data | Our Confidential Information | Data Privacy | Integrity in Financial Reporting

Our Assets and Maintaining Accurate Records

We all must use Molycop funds, property, equipment, and other resources wisely and not for personal benefit. Employees are responsible for safeguarding Molycop's resources under their control, including information, and for maintaining accurate records regarding the use of these resources.

Delegations of Authority (DoA) go beyond financial aspects and apply to everyone by providing clear guidance on what requires approval and at what level. It is important that employees understand the DoA as it applies to their role and work.



Your Obligations:

- Always use company funds responsibly and report expenses accurately and promptly.
- Maintain accurate and auditable records of all financial transactions in accordance with accounting standards.
- Do not remove or use company equipment, supplies, or resources without authorisation. Unauthorised removal will be regarded as theft.
- Always seek management approval before selling, loaning, or donating company resources.
- Always ensure the necessary precautions are in place to prevent theft, damage, or misuse of company resources.
- Intentionally damaging company resources is strictly prohibited.
- When disposing of Molycop's records and other documentation, ensure compliance with the law and applicable Molycop standards and guidelines are followed.



Our Brand, Reputation and Intellectual Property Rights

The Molycop brand is a representation of our longstanding reputation and values. Built over many years of successful operations, our brand reflects our industry leadership and commitment to being a trusted partner to our employees, customers, communities, and stakeholders.

Our innovation has led to unique industry solutions, necessitating rigorous protection of our intellectual property, including patents, copyrights, trademarks, and trade secrets. Similarly, we are committed to respecting the intellectual property rights of others. This respect extends to all materials used in our operations, from software and media to externally prepared training and consulting materials.

For more information please check:

- Contact your IT Department
- Review our Privacy Policy; Social Media Policy
- Contact your Legal & Compliance Department



Your Obligations:

- All Molycop information is confidential and not shared.
- Always get approval before making public statements regarding Molycop in traditional and online media channels.
- Any requests for comment should be directed to marketing@molycop.com.
- Never post content/comments to social networking sites, blogs, forums or in private emails or text messages as representing Molycop without prior approval.
- Always ensure Molycop proprietary marks are used properly and only for legitimate business purposes.
- All work created while working for Molycop, including intellectual property and know-how, remains the property of Molycop.
- As inventors we must promptly notify Molycop so protections (patents, etc) can be formally registered.
- Never bring confidential information from a previous employer.
- Seek approval before sharing Molycop’s intellectual property or using other intellectual property.
- For business purposes, we exclusively use computer software that is appropriately licensed by Molycop.



Safeguarding our systems and data

Molycop provides email services and access to the internet for legitimate business purposes only. The use of these and other systems for non-Molycop business represents a threat to system efficiency and security.

All company information is the property of Molycop. Every employee has a responsibility to protect such information communicated or stored on all electronic devices from accidental and unauthorized access, disclosure, modification or deletion. Molycop reserves the right to monitor use of its information systems and technology. This includes monitoring the nature and content and restricting the transfer of certain material to or from employees. Molycop takes cyber security very seriously and you play a vital role in the defense of our systems and protection of our data. Therefore, employees must continuously practice good cyber-aware behavior including:

- Completing all required cybersecurity training in a timely manner.
- Reporting suspicious behavior or suspected cyber security breach to Molycop IT immediately.

For more information please check:

- Contact your IT Department
- Fair Trading Policy
- Contact your Legal & Compliance Department



Your Obligations:

Employees must not use company computer, email, intranet and internet systems and networks or other devices:

- To send unsolicited bulk emails or transmit chain letters or for mass mailing (spamming).
- To harass, abuse, or defame any person.
- To receive and/or transmit pornography, profanity or other offensive material.
- To obtain, possess or transmit illegal or pirated material.
- In a way that knowingly causes interference with or disruption to any network, information service, equipment or any user thereof.
- To knowingly download unauthorised software, media files or data streams that will create a security risk or use a greater amount of network bandwidth than is appropriate.
- To do anything else which will or may bring Molycop into disrepute; cause Molycop or any of its customers, suppliers or other associates; to bear unreasonable risks or costs; cause disruption to any of Molycop’s business or services or be in breach of any privacy obligations.
- For any other illegal purpose.



Our Confidential Information

Information is a vital asset to Molycop, and its open and effective dissemination is crucial for our success. Much of this information, whether confidential or proprietary, is not widely known outside of Molycop and therefore, it important that we all play our part to protect what is ours and preserve our competitive position.



Your Obligations:

- Always take care to protect confidential information or proprietary information and be careful not to disclose it. Consider carefully if you are discussing or working with sensitive, confidential or proprietary information in public places including restaurants, elevators, planes and other public transport.
- Take care not to transmit confidential or proprietary information by unsecured means.
- Never use or disclose Molycop information for personal gain.
- Only provide confidential or sensitive information to a third party after approval and a contract.
- Never post photos or make remarks on social media about confidential matters or information that is proprietary.
- Immediately report if you receive information that could impact on Molycops brand and reputation.



Data Privacy

Molycop is committed to protecting the privacy of individuals’ personal information by complying with relevant legislation in countries in which it operates.

All customer or supplier information must be managed in a professional and ethical manner with regard to use and distribution of internal records. If customer or supplier records contain information of a personal nature, that information must not be used for any other purpose or disclosed outside the organization without the permission of the customer or supplier, or the individual concerned unless required to be provided by law.

For more information please check:

- Privacy Policy
- IT Cyber Security Policy



Your Obligations:

- Only collect personal information if it is necessary for your business activities and only by lawful and fair means.
- Use personal information only for business purposes relevant to Molycop’s relationship with the individual.
- Only disclose personal information as advised in Molycop’s Privacy Policy.
- Protect personal information received.
- De-identify personal information where necessary or appropriate.
- Allow individuals to access and correct their personal information where appropriate.
- Be aware of the Molycop Privacy Policy.
- Do not collect sensitive information without appropriate consent.



Integrity in Financial Reporting

Molycop is committed to providing accurate, timely and clearly understandable disclosures in reports on its results to stakeholders.

Employees responsible for the preparation of such reports are responsible for the integrity of the information contained in, or which forms the basis, such reports and are expected to exercise the highest standard of care in preparing materials for public communications.

Those reports and communications should:

- Comply with any applicable legal requirements and accounting standards.
- Fairly and accurately reflect the transactions or occurrences to which they relate.
- Not contain any false or intentionally misleading information, nor intentionally misclassify information.
- Be in reasonable detail and recorded in the proper account and in the proper accounting period.

For more information please check:

- Privacy Policy
- IT Cyber Security Policy
- Contact Chief Financial Officer or Finance Department



Your Obligations:

- All material financial information should be represented in Molycop’s accounts.
- No information may be concealed by employees from either Molycop’s internal or external auditors.
- No employee may take any action to influence, coerce, manipulate or mislead Molycop’s external auditors in order to produce misleading financial statements.
- Closure must be accurate.



Protecting Our Business and Reputation



Q&A on Safety:

What would you do?
Here are some scenarios you could find yourself in.

Our Assets and Maintaining Accurate Records

You notice some materials on-site that haven’t been used for some time and can’t be sold to customers. Do you take them off-site to use for your own personal purposes?

No, you need to speak to your manager and get their approval before removing any Molycop asset from site for personal use. Even if the materials haven’t been used for some time or appear to be discarded, removing any of Molycop’s assets from site may be considered theft.

Our Brand, Reputation and Intellectual Property Rights

Ramona, a Molycop analyst, is preparing a presentation for a client and considers including real customer data to illustrate trends. Remembering Molycop’s Data Privacy Policies, she reaches out to the Legal & Compliance Department, who advises her to use anonymized data instead.

By following this guidance, Ramona protects customer privacy and Molycop’s reputation. Always prioritize data privacy. If customer data is needed for presentations or reports, ensure it is anonymized or check with Legal & Compliance Department to avoid risks.

Safeguarding Our Systems and Data

You receive an email from a colleague who you know, from a Molycop email address. It looks suspicious. What do you do?

Do not open any attachments as it may not come from a trusted source. Report the email by clicking the “Phish Alert Report” icon in the top right hand corner of your toolbar or contact Molycop IT immediately for advice.

Our Confidential Information

You are on a customer’s site discussing a product trial and you are advised that the trial was successful. Do you take a photo of the customer’s site and announce it on social media?

No. Molycop encourages sharing good news stories and encourages its employees to engage with and share Molycop content. Whilst the successful product trial story might be shared, it needs to be done according with Molycop’s processes and the customer’s approval before it is officially published to Molycop’s social medial channels. After this has occurred, we encourage the story to be shared as it has been published to the Molycop channel.

Data Privacy

A colleague gives you their personal information. Do you give this information to another colleague when they ask for it?

No. Be aware of the Molycop Privacy Policy and do not collect or circulate personal information without appropriate consent.



Glossary

Modern Slavery	Molycop recognizes the United Nations’ definition of Modern Slavery, which covers practices such as forced labour, debt bondage, forced marriage, and human trafficking. Modern slavery involves exploitation where a person cannot refuse or leave because of threats, violence, coercion, deception and abuse of power.
Child Labor	The International Labor Organization defines child labour as work that is hazardous to a child’s heath and development, demands too many hours and is performed by children who are too young.
Fair Trading	Fair trading refers to ethical and legal business practices that promote a level playing field in the marketplace. This concept encompasses various principles and behaviors.
Human Trafficking	The United Nations defines human trafficking as the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud, or deception, with the aim of exploiting them for profit.
Conflict of Interest	A conflict of interest is a situation in which an individual stands to benefit, directly or indirectly, as a result of a decision they make on behalf of Molycop. That is, a conflict of interest exists where it can be argued that a person’s capacity to make a proper and impartial decision is compromised.
Fraud	Dishonest activity involving deception which results in actual or potential financial loss, whether to Molycop or other parties.
Corruption	Dishonest activity involving a misuse of a position within Molycop, including to achieve personal gain for you or another person or entity (including a Molycop entity)
Money Laundering	Money laundering means disguising the source of money or other assets connected with criminal activity and integrating such money or assets into legal economic and financial flows.
Terrorist Financing	Terrorist financing refers to the provision of funds or financial support to individuals, groups, or organizations engaged in terrorist activities. This support may involve various financial transactions, such as providing funds directly or indirectly through channels that conceal the origin or intended use of the money.
Molycop Trademark	A trademark is a recognisable sign, design, or expression that identifies and distinguishes the products or services of one source from those of others. Trademarks are used by businesses to protect the brand identity of their goods and services, ensuring that consumers can clearly identify who manufactures or delivers a product or service.
Patent	A patent is a form of intellectual property that grants Molycop exclusive rights to an invention, allowing us to exclude others from making, using, selling, and importing our inventions for a limited period of time, typically 20 years from the filing date of the patent application.
Intellectual Property	Intellectual Property (IP) Rights refer to the legal protections granted to creators for their intellectual creations. These rights are designed to encourage innovation and creativity by providing creators exclusive control over the use of their creations for a certain period.
Personal Information	Personal information includes any data that can directly or indirectly identify an individual, such as names, identification numbers, location data, and contact details. It also covers sensitive data like financial information, health records, biometric data, and information related to a person’s race, political opinions, religion, or sexual orientation, which require special protection under some local regulations.
Intellectual Property	Data privacy, also known as information privacy, refers to the aspect of information technology (IT) that deals with the ability for Molycop to determine what data in a computer system can be shared with third parties. It involves the proper handling, processing, storage, and usage of personal information in a way that respects individual privacy preferences and complies with applicable laws and regulations.



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