

Responsible Sourcing Policy

Our Purpose as a company is to responsibly source the commodities that we purchase and supply to our Counterparts. Responsible sourcing is our commitment to take into account social, ethical and environmental considerations with regards to our products and supply chains and when managing our relationships with suppliers. Through our policies, standards, and processes, including this Responsible Sourcing Policy, we respect human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs) and the UN Global Compact. We expect our suppliers to share our commitment to ethical, safe, and responsible business practices. Where feasible, we leverage our business relationships both as a company and via business organizations and promote dialogue with other stakeholders to advance these commitments and industry best practice. For the purposes of this policy, a supplier is any individual or organization that provides, sells materials, products, or services directly to GMI. This policy applies to all employees, directors, and officers, as well as contractors under GMI's direct supervision, working for a GMI office directly or indirectly.

We set requirements and expectations for our suppliers to ensure that they share our commitment to responsible sourcing. We require our suppliers, when working with GMI, to act in a manner consistent with the GMI Supplier Code of Conduct. Additionally, we encourage our suppliers to set expectations for their own suppliers that align with the Supplier Code of Conduct.

We strive to contribute to communities wherever we operate by providing employment opportunities and supporting local businesses. Our procurement strategies are developed locally to reflect the diverse environments in which we operate. We work with local suppliers in the context of these procurement strategies to communicate our expectations and build understanding of our requirements.

We have a comprehensive framework and action plan for identifying and managing the key risks associated with our suppliers, from supplier due diligence, selection, onboarding, and monitoring, through to disengagement. We allocate appropriate resources and assign clear roles, responsibilities, and accountabilities within GMI to implement this framework. We assess suppliers based on their risk and direct them to the most appropriate due diligence and management process for their risk level.

Our due diligence processes address supplier risks associated with legal compliance, abuse of human rights such as equality, non-discrimination and diversity, respect for workers' rights of freedom of association, modern slavery, child labor, health and safety and environmental impacts.

We use a variety of tools to assist us in our due diligence processes, which may include on-site inspections, third party verification, obtaining information from third party sources including authorities, and international organizations. Our Supplier Code of Conduct is incorporated by reference into all our supplier contracts. We communicate our requirements and expectations to all suppliers. We collaborate with our suppliers and relevant stakeholders to address the deficiencies identified and mitigate identified actual or potential adverse impacts as appropriate.

We train our employees and contractors who are involved in procurement, purchasing, sales, trading, contracting, contract management and other relevant functions, on our supplier risk management framework.

We are each responsible for ensuring that we meet our commitments. We expect our employees and contractors to speak openly and raise concerns about possible breaches of the GMI Code of Conduct and this policy with their manager, supervisor or via other available reporting channels. GMI takes concerns seriously and handles them promptly. Our policies support our Values and GMI's Code of Conduct and reflect what is important to us.

External Resources

Extractive Industry Transparency Initiative

ILO Declaration on Fundamental Principles and Rights at Work

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas 3rd Edition Paris Agreement

UN Framework Convention on Climate Change

UN Sustainable Development Goals

UN Global Compact

UN Guiding Principles on Business and Human Rights

UN Universal Declaration of Human Rights

Voluntary Principles on Security and Human Rights