



FUTMIN
Building Future Minerals

Conflict of Interest Policy

This policy outlines our process for identifying, preventing, and disclosing potential conflicts of interest. We constantly behave in the best interests of the company and work to prevent real, imagined, or apparent conflicts.

Introduction:

Undisclosed or mismanaged conflicts of interest can harm our reputation, undermine trust in our internal controls, increase the possibility of corruption or bribery, erode stakeholder confidence in the objectivity of our decision-making, and result in poor quality services and products at exorbitant prices. Investigations, fees, and/or other sanctions for the business or individuals are further potential outcomes.

We always operate in FUTMIN's best interests, work to avoid real or imagined conflicts of interest, and put policies in place to make sure that conflicts are handled properly.

This Conflict-of-Interest Policy sets out FUTMIN's approach to:

- recognising and avoiding conflicts of interest; and
- declaring conflicts of interest.

Scope of Policy:

This policy is applicable to any personnel working for a FUTMIN office or industrial asset that is directly or indirectly owned, controlled, or operated by FUTMIN anywhere in the world, including employees, directors, and officers as well as contractors who are directly supervised by FUTMIN.

Our Commitment:

Conflicts must be avoided wherever feasible. We consult Compliance if we are unsure whether a given circumstance constitutes a conflict.

Types of conflicts we must declare are:

- being a shareholder, an owner, or a director of a third party
- a relationship, either personal or professional, with a third party.
- engaging in outside employment that will interfere with the performance of our duties at FUTMIN or that could taint our objectivity, such as serving as a consultant, employee, director, officer, or manager for another business or organisation.
- collaborating with or considering hiring a relative or close personal relation (e.g., considering a job application from one of us or being in a position to influence aspects of the application, such as direct and indirect reporting relationships, pay, and promotion);
- offering, providing, or accepting gifts or entertainment to or from a third party while we are deciding whether to enter into an agreement or transaction;
- managing, directly or indirectly, a close personal relation

Changes to a previously declared conflict

Any updates to a conflict that we previously declared via the platform must be made in the same way. Any updates to our declaration must be made using the paper change to previously declared conflict of interest form and sent to Compliance if we are unable to use the platform. Compliance will then enter the update into the platform.

What happens once we declare?

Once a dispute has been declared, efforts will be taken to make sure it is handled properly. We can be forced to resign from a job or have our work hours limited (e.g. preventing us from taking part in decisions, joining meetings on the conflicting subject matter or receiving certain information).

Consequences:

Our policies reflect what is significant to us and support our values and code of conduct. FUTMIN treats violations of our policies severely. Consequences may include a warning or even the termination of employment, depending on how serious the transgression was.

Oversight, Assessment and Review:

The Ethics & Compliance Office, as a unit of the Internal Audit, Ethics & Compliance Office and Risk Division, shall periodically, and at least on a yearly basis, review and assess all conflicts of interest existing in FUTMIN in order to implement the necessary mechanisms designed to prevent any interferences with the objectivity, unbiased judgement and loyalty of FUTMIN's employees in their decision-making responsibilities.