

# Due Diligence Compliance Report Cobalt/Lithium/Nickel Procurement

REPORTING YEAR 2024

## Actor's details

**Actor's name** Umicore  
(Business Group Energy & Surface Technologies)

**Location** Broekstraat 31 Rue du Marais  
1000 Brussels  
Belgium

*The Sustainable Procurement Frameworks for Cobalt, Nickel and Lithium and the corresponding due diligence activities (including the compliance report) cover all Umicore facilities.*

**Reporting Year-end** 31.12.2024

**Date of Report** 10 March 2025

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**Compliance Report's scope** The scope of this Compliance Report includes the procurement activities of cobalt, nickel and lithium by Umicore Supply and Refining for the business units 'Cobalt and Specialty Materials' and 'Rechargeable Battery Materials' in the reporting year 2024.

At the time of writing, Umicore's cobalt activities include the following refineries that have been assessed by the RMI RMAP:

- Umicore Olen (CID003228), RMI conformant, last RMAP on-site assessment in April 2024 (covering assessment

period 1 October 2022 to 29 February 2024; lead assessor Arche Advisors, [link to report](#)). Next RMAP on-site assessment is being scheduled at the time of publication.

- Umicore Finland Oy (CID003226), RMI conformant, last RMAP on-site assessment in April 2024 (covering assessment period 1 October 2022 to 29 February 2024; lead assessor Arche Advisors, [link to report](#)). Next RMAP on-site assessment is being scheduled at the time of publication.

At the time of writing, Umicore's cobalt activities include the following refineries that have not yet been assessed by the RMI RMAP:

- Ganzhou Yi Hao Umicore (CID003227), preparing for RMI eligibility.

## Section 1. Establish strong Company Management Systems

### 1.1. Due diligence policy of our supply chain of cobalt, lithium and nickel (battery materials)

‘The Umicore Way’ describes Umicore’s mission and its core values related to its business conduct. It is at the heart of Umicore’s culture. Umicore has adopted a set of policies to ensure its activities and those of its business partners are conducted in line with the principles outlined in ‘The Umicore Way’. These include the Umicore ‘Code of Conduct’ for Umicore employees and contractors, as well as the ‘Umicore Global Sustainable Sourcing Policy’, applicable to suppliers.

In our entire supply chain and in all areas of procurement – whether raw materials, energy, other goods or services –, we are committed to promoting fair and ethical business practices, ensure health and safety, and manage the impact on people, climate and environment. In order to do so, we ask our suppliers to adhere to Umicore’s Global Sustainable Sourcing Policy, complemented by additional guidance for specific materials through a risk-based approach.

In addition to Umicore’s policy on ‘Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas’, there are material specific frameworks for cobalt (since 2012), nickel (since 04/2023) and lithium (since 04/2023). The frameworks reflect Umicore’s commitment to strive for sustainable and ethical supply chains of battery materials. The frameworks define Umicore’s responsibility for conducting risk-based due diligence, screening and monitoring of all its suppliers. They outline how due diligence is conducted and are publicly available on Umicore’s website. An internal procedure, including a process flow decision tree, has been developed to explain and document in detail the due diligence processes. As part of our continuous improvement, the Cobalt Framework has been fully reviewed and updated in December 2022 (applicable since 1 January 2023), introducing among others a wider scope of ESG risks to be assessed, guidance on performance expectations on ESG, as well as a requirement to get certified against a recognized due diligence and ESG standard. The Nickel and Lithium Frameworks were developed at the same time as the Cobalt Framework update and follow the Cobalt Framework almost entirely: there are only two minor differences. The first relates to examined risk areas: whereas in essence the same, the Cobalt Framework refers explicitly to ASM risk as a zero-tolerance issue, whereas that is not included for nickel and lithium. Secondly, the traceability aspiration is different: while for cobalt and lithium we guarantee visibility up to the mine in case of primary raw materials, for nickel we strive towards full visibility, as in some cases it is difficult to establish full traceability up to the mine (and only possible to the level of processor).

The current compliance report will evaluate Umicore's due diligence processes against the new cobalt, lithium and nickel frameworks. Umicore's due diligence management system is set up in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD, 2016).

The policies mentioned have Umicore-wide coverage and are thus not site-specific. All cobalt, lithium and nickel sourced and processed within Umicore is covered by the respective Sustainable Procurement Frameworks for Cobalt, irrespective of location or flows.

The following documents are available via Umicore's website:

- [The Umicore Way](#)
- [Code of Conduct](#)
- Umicore [Global Sustainable Sourcing Policy](#)
- Umicore policy on [Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas](#)
- [Sustainable Procurement Framework for Nickel](#)
- [Sustainable Procurement Framework for Lithium](#)
- [Sustainable Procurement Framework for Cobalt \(applicable since January 2023\)](#)

## **1.2. Management structure to support our supply chain due diligence**

The Umicore Sustainable Procurement Frameworks for Cobalt, Lithium and Nickel (hereafter referred to as the "Frameworks") define the governance for Umicore's due diligence practices for the supply chains of cobalt, lithium and nickel.

The Responsible Sourcing team within the Corporate ESG department is responsible for the implementation of the Frameworks. In the execution of this task, the team is supported by the respective supply teams and the Strategic Insights & Analysis team for additional intelligence, and by the commercial back-office teams for support regarding chain of custody documentation. The Umicore trade compliance team is responsible for sanctions screening and export control, and will flag if any of the suppliers are impacted. Similarly, the Corporate Security Office is responsible for checking ethical business behaviour of Umicore suppliers and will flag and/or advice in case of claims related to corruption, bribery, fraud or tax evasion.

A dedicated committee, referred to as the "Approval Committee", ensures adherence to the principles and guidelines of the Framework. This Approval Committee has the responsibility to evaluate due diligence findings and mitigation actions executed and/or recommended by the Responsible Sourcing team, and procurement decisions for all battery materials. Upon recommendation of the Responsible Sourcing team, the Approval Committee needs to approve any changes to the internal procedures or Frameworks. Such changes result among others from effectiveness reviews through

KPI tracking as well as findings and learnings through audits (including annual third-party assurance of compliance report; RMI RMAP).

The Approval Committee consists of the following senior management roles: Senior Vice-President Supply UBM, business heads supply (Co, Li, Ni), Senior Vice-President CSM, Vice-President Inorganics & Distribution, Group Director ESG Business Integration, Program lead Responsible Sourcing lead, Responsible Sourcing managers. The Committee meets at least twice per year, and on ad-hoc basis if required. In 2024, four (three standard and one ad-hoc) Approval Committee meetings were organized. The governance structure was effectively applied in the reporting year 2024.

### **1.3. Supply Chain Traceability: established system of controls in order to ensure transparency over our cobalt, lithium and nickel supply chain**

Umicore strives to have full visibility over its supply chains and maps its entire internal raw material flow, production processes and product flows for all products. For each end product, Umicore can identify the potential suppliers of raw materials and their origin.

For cobalt, Umicore is able to identify the mines from which the procured primary cobalt material originates by means of chain of custody documentation and/or an additional confirmation of origin from suppliers that source from several mining locations (traders). For recycled material, Umicore cannot identify the mine the cobalt was originally sourced from. In this case we require reassurance from recyclers that their material comes from recycling feed, beyond which our traceability ends.

For lithium, we have traceability to the mine for battery applications (carbonate, hydroxide, sulfate). We do not have traceability to the mine for 3 suppliers of Li fluoride, accounting for 0,2% of total lithium-containing volumes.

For nickel, Umicore is able to identify the supply chain of procured material up to the level of the processor, and strives to have traceability up to the mine, which is already the case for a large part of our incoming nickel-containing material (around 93% of total volumes). For some individual cases, however, full traceability is hard to establish as traceability is a relatively new requirement for some actors of the nickel industry. Concerns such as smuggling or misrepresentation of origin like in cobalt supply chains are much less relevant for nickel, which is why stringent traceability processes are sometimes yet to be set up. For logistical and efficiency reasons ore might be mixed during transportation to the processor facility, e.g. on a ship. Umicore is engaging with relevant stakeholders such as respective government authorities and suppliers to raise awareness on this issue and working towards establishing full traceability.

In 2024, for the first time Umicore received and processed materials (Co, Ni, Li) that were sourced by a customer. In principle, the customer is responsible to conduct due diligence on its suppliers and ensure that only responsibly sourced material can enter Umicore flows. Nonetheless, as a matter of good practice, the responsible sourcing

team also needs to conduct due diligence both on the customer (also tier 1 supplier in this case) and its suppliers (Umicore tier 2 suppliers). For the first incoming materials from this customer though, this did not happen immediately, as the responsible sourcing team was not informed on time of this commercial decision. As soon as the responsible sourcing team found out through a regular data check of incoming transactions, actions were taken to map the supply chain (to a minimum of processor level (1 Ni supplier) and where possible mine level (Co, Li and remaining Ni suppliers) and conduct the due diligence as described below (including SAQs to tier 1 and 2, BPS of tier 1 and 2). To prevent this situation going forward, Umicore is in the process of developing a more robust approach to deal with customer-sourced material, involving the relevant internal stakeholders (ESG, sales, supply). The new procedure is expected to be finalized Q1 2025. Also, the responsible sourcing team organized a responsible sourcing training including on customer-sourced materials for both supply team and sales teams, emphasizing the importance of screening any incoming material, irrespective of who it was sourced by.

With regard to transactions, Umicore has a process in place that ensures that transactional details are recorded and that relevant documents related to origin, transportation and tax payments can be obtained. While we have the proof of origin for all transactions up to (at minimum) processor level for nickel, and mine level for cobalt and lithium, for transactions with traders we do not always receive all transportation documents or other legal documents such as proof of tax payments. Missing documentation of this kind is provided to us upon request for sample transactions during audits. On Umicore's side, we continuously aim to strengthen the consistency of chain of custody documentation for all transactions and across different Umicore sites and business units. A dedicated training on this topic was given for all back office and supply teams. Certain operational sites use different management software, requiring dedicated processes to improve information and data exchange with the responsible sourcing team.

In addition to chain of custody documentation, the origin of incoming materials can be guaranteed through dedicated material control procedures at Umicore's facilities, such as sample testing and material fingerprinting.

Umicore's cobalt smelters in Olen (Belgium) and Kokkola (Finland) have been RMI conformant since 2019. Re-assessment RMAP audits against the Cobalt Due Diligence Standard have been conducted on both sites in April 2024. The audit reports were received in July 2024 (Kokkola) and September 2024 (Olen). No major issues were identified for either audit. Four minor findings for the Olen audit (clarifications on legacy material; clarification on procedure for high-risk countries) were addressed through a CAP process in October 2024. A re-assessment of the sites will be conducted in Q2 2025, jointly with an assessment for nickel against the RMI RMAP All Minerals Standard. The RMAP assessments help us to continuously improve our due diligence efforts.

## 1.4. Grievance mechanism

Umicore has a public grievance mechanism (Umicore Integrity Line), in place since 2018. The integrity line is accessible via the website and phone. As described in the internal policy (Global Guideline on Whistleblowing) the grievance mechanism is open to both internal and external people to raise a genuine concern or suspicion about a risk, malpractice or wrongdoing that concerns Umicore in areas such as but not limited to:

- Finance and accounting (including fraud and misappropriation of assets),
- Bribery and corruption,
- Antitrust practices,
- Danger to health and safety,
- Danger to the environment,
- Discrimination and harassment.

All the notified cases are fully investigated. After each investigation, a detailed investigation report is drafted and discussed with the BU (and often P&O). The report includes key findings and recommendations. It is up to the local management/BU to follow up on the decided actions. Every 6 months, a semestrial report on the notified cases/investigations is presented to the Code of Conduct Committee that discusses the consistency of the measures, general trends, etc. It is part of a "global" follow up.

## Section 2: Identify and Assess Risks in the Cobalt Supply Chain

Each supplier undergoes a risk assessment, whereby the level of scrutiny and detail depends on the proximity in the supply chain and Umicore leverage. The objective of the risk assessment is to identify and evaluate the risks of human rights issues, unethical business practices or contributions to harm to people, the environment or society. Direct suppliers of primary raw materials (mine and refiner/processor) undergo an extensive ESG screening. Tollers, traders and customer with consigned (customer-sourced) materials are subject to an adapted screening, with a strong focus on their due diligence policy and requirements on suppliers. For supply chain actors such as warehouses and transportation companies we focus on the most salient risks defined by our risk mapping and/or external sources. In 2024, screening of the latter actors has been conducted for those materials originating from or being transported through CAHRA countries. It is Umicore's ambition to increase visibility on warehouses and transport companies also in non-CAHRA regions in order to not miss potential risks arising from these.

The risk assessment of a supplier takes into account the country in which the supplier is located and the country – if disclosed by the supplier – through which the material is transported (i.e. country risk), as well as the policies, management system and practices the supplier has put in place or information collected through Internet screening, dedicated due diligence tools or commercial and sustainability insights (i.e. supplier risk). Particular attention will be paid to certain risks linked to a specific

material, based on likelihood and severity (i.e. material risk). The outcome of the risk assessment then determines whether enhanced due diligence screening is required.

In 2024, the internal procedure was updated to clarify when suppliers would be subject to enhanced due diligence screening. Suppliers with no risk indicators identified through a first thorough screening, will not be subject to enhanced screening anymore.

For the risk assessment, the team is supported by the insights of the supply team (both in Europe and locally in the sourcing regions, including DRC) and Umicore's Strategic Insights and Analysis team. In addition, for any issues related to bribery, corruption or fraud, Umicore's Corporate Security team can be consulted.

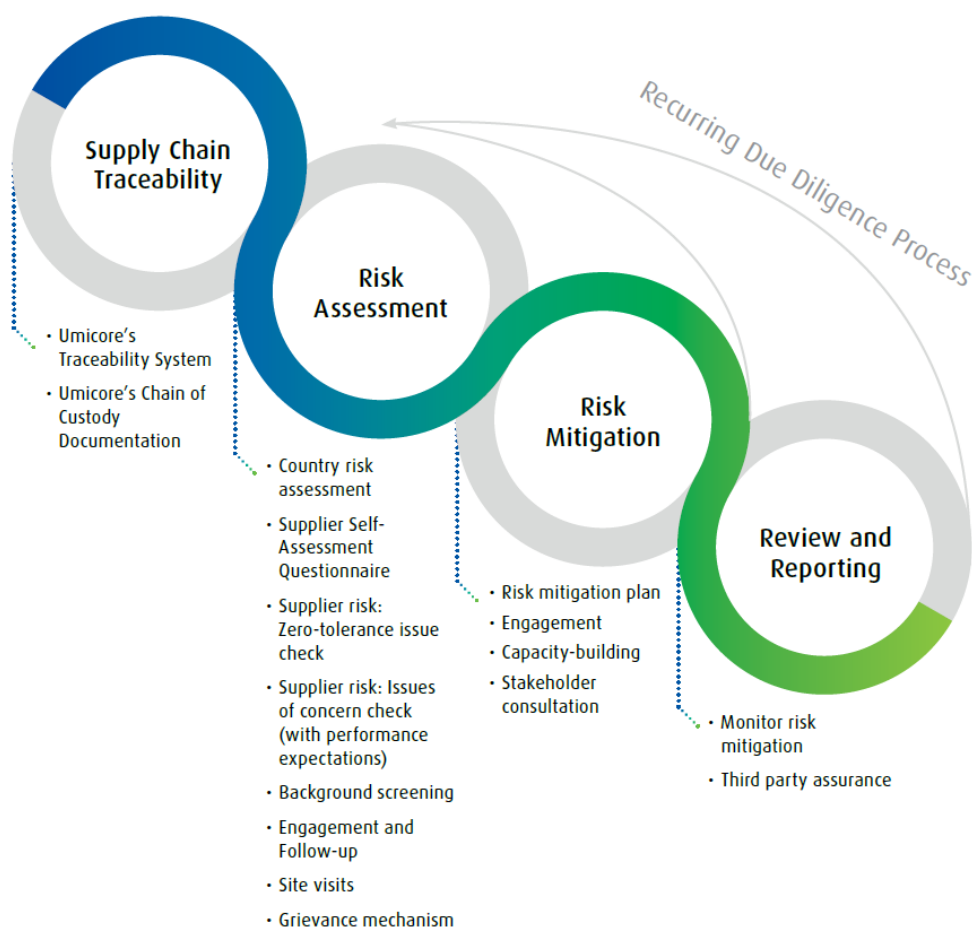


Figure 1: visual representation of the Umicore due diligence process

In 2024, Umicore performed risk identification and assessments steps as described in Umicore's Frameworks by applying the following steps:

- Country risk assessment
- Supplier risk assessment:
  - Self-Assessment Questionnaire (SAQ)

- Business Partner Screening (BPS)
- Assessment of zero tolerance issues and issues of concern
- Site visits/ audits

## 2.1. Country risk

The country risk is a first step to determine the level of scrutiny in our due diligence processes and type of risk in a country will also impact the risk management approach: conflict-affected areas require a different risk management approach compared to areas with high environmental risk for instance. Because of this, at Umicore, we make a distinction between high-risk countries and conflict-affected and high-risk countries (CAHRA).

For CAHRA – with a specific focus on conflict – we rely on the EU CAHRA list and the US Dodd-Frank Act. Irrespective of other risk analysis, in case of CAHRA, specific due diligence requirements are triggered as prescribed by the OECD and RMI RMAP, such as on-the-ground assessments. In 2024, we were fully compliant with the Framework requirements for such on-the-ground assessments (see below under ‘Visits and audits’).

For other high-risk countries, a risk score (low/medium/high risk) is given across four categories: conflict, governance, human rights and environment. This score is based on 16 external, well-recognized indices, and is reviewed every six months. The specific context around the country risk for high-risk countries is documented in a dedicated country risk assessment document. These context documents are updated at least once per year (or more frequently if the situation would require). In October 2024, the assessment for country risk was amended in order to create 1 consistent list company-wide with an ‘ESG score’, and a listing for other risk categories. Whereas previously any country with sanctions or any CAHRA or Dodd-Frank country was automatically considered high-risk irrespective of its score on the 16 indices, this has now been split. Countries receive a low-medium-high risk score on the 4 categories of conflict, governance, human right and environment; and this score will be determining our ESG due diligence. In addition, it is also listed whether countries are on any sanction list (EU, US, UN), whether they are on the grey/black list of the Financial Action Task Force (FATF), whether they are considered a tax haven according to the Belgian Tax Haven List, and whether they are considered CAHRA or listed under Dodd-Frank. Each of these criteria trigger additional actions across different teams in Umicore. For example, the trade compliance team will act and/or advise in case of sanctions; the finance team will act in case of tax havens; etc.

The country risk assessment outcome will inform next steps in our due diligence processes, such as the requirements of additional screening or site visits. The 2024 country risk methodology review did change the risk score of a few countries, a notable example being China that went from high risk to medium risk for ESG. This changed risk score has an implication mostly for the automatic requirement of site visits (see below under ‘Site visits and audits’).

## 2.2. Supplier risk

To assess risk indicators linked to the supplier, a screening of the general information and ESG management systems of a supplier is conducted through the Business Partner Screening. Suppliers are also asked to complete a Self-Assessment Questionnaire (SAQ). Based on the risk identified in the SAQ and/or the general information risk assessment, additional due diligence steps (enhanced due diligence) may be taken.

### ○ SELF-ASSESSMENT QUESTIONNAIRE (SAQ)

As a first step in the information collection on the supplier, all direct suppliers (in case of traders or sourcing through the customer, also Umicore's tier 2 suppliers) are requested to complete the SAQ. Together with the Business Partner Screening (BPS), the SAQ will be assessed to determine the risk of a supplier. Depending on the type of supplier (e.g. mine, refinery or trader), the SAQ will be more or less extensive. The SAQ is asking about management systems and implementation, but also focuses on the supplier's own risk assessment and actions taken. One-off suppliers (spot purchases) are not asked to fill in an SAQ, and the likelihood of risk will be determined by the country risk assessment in combination with a high-level background screening.

Suppliers are asked to repeat the SAQ every year and notify explicitly where updates have been made or changes occurred. In case of new suppliers, suppliers are asked to complete the SAQ prior to receiving materials. If that is not possible, we engage with the supplier to complete it within 3 months after receipt of material. In case of failure to complete the SAQ within a reasonable time period after having received it, the case is escalated to the Approval Committee to determine any potential actions. Any decisions will follow a risk-based approach, and will depend on the information that is already available to us publicly. SAQs that were not received, were escalated to the Approval Committee, except for 5 cases: 1 low-risk supplier that was mistakenly not flagged; 3 low-risk tollers with all sources known and a completed SAQ dating from 2023; and 1 small trader with all sources known and a completed SAQ dating from 2023.

In 2024, the SAQ records are as follows:

- At year-end, SAQs had been sent to existing direct suppliers as per the requirements of the framework, except for 4 cases
  - in 2 cases it was decided by the supply team not to contact the supplier for commercial reasons
  - in 2 cases the SAQ was not sent due to internal misalignment. Both SAQs have been sent at the time of writing of this report.
- There were 7 new direct suppliers in 2024 (2 battery applications; others non-battery application). Only 1 supplier received the SAQ prior to Umicore receiving the material. 2 suppliers received it within 3 months of receipt of material, and 4 suppliers received it more than 3 months after receipt of material. This delay can be explained by an internal procedure update introducing the SAQ timeline requirement only formally in May 2024 and internal misalignment on how to approach traders and sourcing-by-customer.

- Out of all SAQs, 86% were sent to direct suppliers.
- 14% were sent to indirect suppliers (sourcing by customer; suppliers through traders)
- SAQs got a response rate of 66% in 2024.

Responsiveness and completeness in filling in SAQs remains a challenge, in which case the risk assessment will be conducted without the (full) information provided by suppliers. Unanswered SAQs may be particularly problematic with regard to missing information that is hard to obtain publicly such as sources of material (in case of traders), transport routes and logistical partners. We aim to tailor our SAQ as much as possible to the supplier type, while still ensuring we get sufficient view on the risk and the risk management system in place.

For traders Umicore has taken specific measures to obtain as much traceability information as possible. These include a simplified SAQ focusing on traceability and basic policy coverage. As some traders are very small companies with no operating sites, some of the zero tolerance and issues of concern do not apply to them, e.g. environmental & community impact. The focus of our screening is hence on obtaining full visibility up to the source of raw materials and conducting risk assessments on those companies and sites identified.

#### ○ BUSINESS PARTNER SCREENING (BPS)

For all direct suppliers, Umicore performs an annual Business Partner Screening (BPS), based on a desktop review (media, NGO reports, audit reports,...), market intelligence, our own insights from visits, stakeholder insights and, where possible, engagement with the supplier. The BPS covers among others company structure, ultimate beneficial ownership (up to 10%), management, business ethics, origin of material, transport routes, and an ESG risk screening. Any warning signals or high-risk indicators will then trigger, together with the information from the SAQ, additional due diligence. Sourcing from or transiting through CAHRA (OECD red flag situations) will automatically trigger additional due diligence.

In the ESG risk assessment, we distinguish between zero tolerance issues and issues of concern. Indications of zero tolerance issues will lead to engagement with the supplier and risk mitigation actions. Identified evidence of zero tolerance issues linked to Umicore's supply chain and no willingness to improve from supplier's side will lead to disengagement. These decisions are taken by the Approval Committee.

The zero tolerance issues as defined by the framework are:

- Any form of torture, cruel, inhuman treatment or punishment or worst forms of degrading treatment;
- Any form of forced or compulsory labour;
- The worst forms of child labour (*note: all other forms of child labour still an issue of concern to be investigated, mitigated and remedied*);
- War crimes or serious violations of international humanitarian law;

- Direct or indirect support to non-state armed groups, public or private security forces;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Hand-picking and/or artisanal mining (as primary source) (*note: this is only applicable to cobalt*);
- Supplier is not willing to accept the principles stated in the Umicore Global Sustainable Sourcing Policy or does not have similar policies in place.

In addition to the zero tolerance issues, indications of issues of concern will be assessed as well. In the Framework, the issues of concern are accompanied by performance expectations to give guidance to our suppliers on their scope. Practices are considered issues of concern, when they do not match these expectations, but can be remediated via a dedicated action plan. The issues of concern are defined as below:

- Hand-picking and/or artisanal mining (as secondary source) (*note: this is only applicable to cobalt*);
- Supplier does not have the minimum required legal permits and certificates;
- Supplier has not adopted appropriate remediation actions and mitigation plan related to any historic zero-tolerance issues that can be linked to Umicore's current supply chain;
- Supplier does not have procedures in place to minimize environmental impact;
- Supplier does not have procedures in place to ensure a working environment that respects human and labour rights;
- Supplier does not have procedures in place to minimize adverse social impact;
- Supplier is not certified nor committed to be certified against OECD Annex II and/or OECD aligned Due Diligence.
- Supplier is not certified nor committed to be certified against a third-party audit sustainability programme in accordance with Umicore requirements.

The performance expectations give further guidance on the requirements regarding labour & human rights, business integrity, environment, community & stakeholders, contractors and supply chain as well as standards and certification.

An overview of the issues and follow-up actions during the reporting year 2024 can be found in Annex to this report.

In 2024, a BPS was conducted on every direct active supplier (tier 1). In case of active traders, all tier 2 suppliers (material sources), were screened through a BPS as well. Around 77% of those risk assessments were performed on time (within a maximum of 2 weeks delay), in line with our frameworks. For the remainder, 8% of BPS were completed within a 3 week delay and 15% were delayed by more than 3 weeks. All BPS delayed by more than 3 weeks represented suppliers with smaller volumes. The delays were due to the following reasons:

- No information was available publicly so the BPS could only be completed after having received the SAQ from the supplier
- Believed supplier was inactive but found transactions during the year during data checks
- Material was sourced by customer and supplier name appeared with transactions. Once clarified that the transactions were customer-sourced raw materials, BPS were conducted on the customer's suppliers (Umicore tier 2)

For new suppliers of battery materials (limited to Umicore's Battery Materials Business Unit), in September 2024 an updated supplier qualification procedure has been introduced to integrate ESG in all business and quality processes. A high-level ESG screening with dedicated risk score must be conducted by the Responsible Sourcing team before any commercial decisions can be made. Since its introduction, this procedure has been duly followed.

### 2.3. Visits and audits

Site visits and on-the-ground assessments to monitor and evaluate the practices of a supplier (primary focus on refiners and mines due to their inherent risks) are an essential part of our due diligence processes, as on-the-ground presence can give invaluable insights and better understanding of the context. Our procedure outlines when a site visit or third-party assessment is required based on risks. Visits to suppliers can also happen for commercial reasons, in which cases we also aim to integrate an ESG screening.

The requirements for site visits have changed since 2024: previously the procedure prescribed the obligation to conduct a site visit to suppliers in high-risk countries every 3 years and to suppliers in medium- and low-risk countries every 5 years.

The procedure has been updated (approved by Approval Committee) and today a decision for a site visit can be taken on different grounds: firstly, visits can be paid prior to starting any business relationship or during the business relationship to inform our ESG due diligence and building a trust relationship with the business partner.

Secondly, visits can be required by the frameworks as they are triggered by a specific risk, and as such can be part of a risk assessment and/or mitigation strategy.

Thirdly, visits can be triggered based on the Umicore country risk assessment. When a supplier from a high-risk country is not certified against an OECD-aligned standard, Umicore will perform a visit every 3 years. If a supplier holds a relevant certificate (such as RMI RMAP, IRMA, Joint Due Diligence Standard) the site visit is not required as per the Framework (but may nonetheless take place). In addition to Umicore-led site visits, suppliers sourcing from or transporting through CAHRA need to be assessed every 3 years by independent auditors. Audits performed in the context of an OECD-aligned industry standard certification conducted in the last 36 months can be taken into account. When that is not the case, an on-the-ground assessment will need to be scheduled as soon as possible.

Site visits and on-the-ground assessments can be done by Umicore, collaboratively with partners, or through a third-party audit. Visits to 2<sup>nd</sup> or 3<sup>rd</sup> tier suppliers could be

considered as well based on our risk assessment, however, it is in those cases not always possible to request or perform those due to lack of a direct engagement. In those cases, Umicore has to rely on the due diligence executed by Umicore 1<sup>st</sup> or 2<sup>nd</sup> tier supplier, evidenced for example by certification against an OECD-aligned standard.

ESG site visits can be conducted either by the ESG/responsible sourcing team or by commercial teams, which are fully trained on the Frameworks and aware of potential risks on site. Whereas the aim is to have a formalized visit report for each visit conducted, that is not always the case – yet, potential issues identified are reported on and discussed between the different teams. In 2024, the site visit report template was updated to make it easier for different teams to fill in the report through more targeted questions. In addition to the visits and audits, Umicore has dedicated staff on the ground in DRC and Indonesia liaising with suppliers as well as relevant stakeholders, communities and NGOs in the country.

The Approval Committee will take the final decision regarding site visits and audits. It can decide to deviate from the above rules and timeline but needs to justify that decision. Such reasons could be a lack of a long-term contract, very low volumes or no risk identification over the last years of screening.

At the end of 2024, no visits were missed or still due for this year. However, in October 2024, our country risk methodology changed, resulting in a different risk score for a few countries. The most notable country for us was a changed risk from high to medium for China, thereby removing the site visit requirement. Prior to the change in risk level, four visits were overdue for Chinese sites. For 2 sites, multiple commercial visits had taken place in 2023, but without a dedicated ESG screening. The Approval Committee decided that additional visits were not required, but that ESG screening would be included in the next visit. 1 of these sites and 2 additional sites were at the time in a certification assessment process. The Approval Committee decided that a visit was not urgently required while the assessment was ongoing. Going forward, ESG site visits to Chinese sites will only be required when triggered by risk, and not automatically because of the country risk.

In 2024, 3 dedicated ESG site visits were done, as well as 4 additional commercial visits that also addressed some ESG questions. In addition, multiple visits were undertaken to potential suppliers, both from an ESG, quality and commercial perspective.

Most visits were triggered by our risk assessment, and for some a commercial visit was combined with an ESG screening. No visits were conducted based on the country risk requirement. A study trip was conducted to Indonesia with a focus on labor rights analyzing specific risks and local dynamics, including exchanges with government representatives, unions, workers, civil society, companies as well as communities.

## 2.4. Certification

The Frameworks express a clear expectation towards suppliers (refiners and mines) to be third-party certified against a well-recognized industry standard (e.g. RMI RMAP or Joint Due Diligence Standard for refiners; e.g. IRMA, Copper Mark, TSM for mines). The Nickel and Lithium Frameworks set a target date for refiners for 'by 2025 latest', and for mines to have initiated a certification process by 1/12/2023 with the objective of full compliance by 31/12/2025 (for Cobalt: initiation by 1/6/2023 and compliance by 1/12/2025). We strongly encourage all suppliers to be certified as a useful tool in the due diligence process (not a replacement of our due diligence processes). Most suppliers are already certified (65%) or in an ongoing assessment (8%). With other suppliers we are in close engagement with them to prepare for an assessment (8%). However, there are certain cases where suppliers are not planning on full certification for reasons of cost and resource constraints. Those suppliers are usually in low-risk countries or dealing with low-risk flows. One supplier will stop operations at the end of 2024.

## 2.5. Comments and Demonstration of Compliance

Umicore's Framework ensures that risks in its supply chain are identified through supplier questionnaires; Business Partner Screenings, a requirement to be certified against a third-party industry scheme or standard, and by conducting site visits on a regular basis in high-risk countries or when triggered by risk. An overview of the risks identified and the risk mitigation (see next section) can be found in the Annex of this report.

## Section 3: Design and Implement a Strategy to respond to Identified Risks

### 3.1 Engagement

When (potential) risks are identified with direct suppliers, we aim to engage directly with the supplier to further map the actual circumstances of the supply chain and the risk and impact (e.g. clarification on certain documents, understanding if systems in place are efficient, risk mitigation measures already in place,...), but also to discuss risk mitigation measures (e.g. additional management processes, standards, training and capacity-building,...). In case of indirect suppliers, depending on Umicore's leverage, relationship and the proximity to the supplier in question, we may still aim to engage directly, individually or jointly. The engagement can be in the form of emails, virtual meetings or an on-site meeting.

Where possible, Umicore will also engage with impacted and relevant stakeholders (e.g., local communities, workers and employees, trade unions, NGOs, industry peers...) to provide additional insight and evidence on the actual or potential adverse impacts that have been identified. In addition, the views of stakeholder and experts can contribute to determining the appropriate responses and risk mitigation actions.

### 3.2 Development and monitoring of a risk mitigation plan

When risks have been identified through the SAQ, additional background screening, follow-up and/or site visits/audits (depending on the risk level), they are logged in a dedicated risk log. The risk level, the appropriate governance/escalation levels and any actions taken are recorded as well. In principle, Umicore would develop risk mitigation plans together with the supplier – however, in practice, often measures to be taken are discussed more informally with the suppliers, due to the nature of the risk (e.g. 'ongoing' or systemic issues; low risk) or due to actions already taken or in progress. Only in few cases has a full risk mitigation plan with corrective actions (+ expected output and outcome) against a set timeline been drafted. In other cases Umicore followed closely progress against the corrective action plan of an industry standard, or against action plans already drawn up by the supplier in question. While this more 'informal' approach works well in practice, it can be more challenging to monitor strictly the timelines if these have not been jointly agreed. With a view on continuous improvement, we will explore further how risk mitigation plans could be further implemented, without losing the benefits and the 'collaborative spirit' of a more informal approach.

Actions agreed upon with suppliers, either informally or through a risk mitigation plan, will be communicated to senior management within the Approval Committee.

As with the direct engagement, the development and follow-up of risk mitigation plans will depend on Umicore's leverage on and proximity to a certain supplier. Depending

on that leverage, collaborative action rather than direct 'requirements' may be the preferred option. Depending on the impact, mitigation actions are expected to be implemented within different timeframes: for any high-risk impacts identified, suppliers are expected to implement corrective actions within a shorter timeframe than low or medium risks, before any decision on the business relationship will be re-evaluated.

In 2024, 53 new issues were logged in the risk log, in addition to the issues logged already earlier and still open (14), and those logged earlier and closed in 2024 (15). Open risk issues and actions are described in the Annex below.

Risks linked to 12 suppliers were discussed during four Approval Committee meetings in 2024. Risks linked to 6 suppliers were potential zero tolerance issues. The other risks were not escalated due to the risk level, but were still discussed for information due to other reasons such as commercial importance. An overview of the issues and follow-up actions during the reporting year 2024 can be found in Annex to this report.

### **3.3 Comments and Demonstration of Compliance**

Umicore's Framework ensures that identified risks are addressed, and that follow-up on indications of zero tolerance issues and issues of concern is performed, including the investigation of the indications, outreach to stakeholders and discussion with the Approval Committee. An overview of the indications and follow-up can be found in the Annex of this report.

## Section 4: Independent Third-party Audit of Supply Chain Due Diligence

### 4.1 Comments and Demonstration of Compliance

PwC Bedrijfsrevisoren bcvba/PwC Reviseurs d'Entreprises scrl<sup>1</sup> provided their independent ISAE 3000 limited assurance report on this Compliance Report in respect of the activities undertaken by Umicore during the year 2024 to demonstrate compliance with Umicore's Sustainable Procurement Framework for Cobalt; Sustainable Procurement Framework for Lithium; and Sustainable Procurement Framework for Nickel. The limited assurance report is available to Umicore customers and stakeholders upon request.

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<sup>1</sup> PwC has performed the above mentioned engagement and report for the Umicore Sustainable Framework for Cobalt/Lithium/Nickel solely for use by Umicore CSM and RBM under a contract agreed upon with Umicore SA. PwC does not have any obligation towards any other person; PwC does not have nor accept any liability or responsibility (contractual, extra-contractual or otherwise) towards any such other person.

## Section 5: Report on Supply Chain Due Diligence

### 5.1 Comments and Demonstration of Compliance

The Compliance Report is Umicore's report on the due diligence of its cobalt supply chain. The report will be available online on the Umicore website. Relevant policies are publicly available, including 'The Umicore Way', 'Code of Conduct', 'Global Sustainable Sourcing Policy', 'Policy On Responsible Global Supply Chain Of Minerals From Conflict-Affected And High Risk Areas' and 'Sustainable Procurement Framework For Cobalt/Lithium/Nickel'.

Additionally, the limited assurance report by PwC Bedrijfsrevisoren bcvba/PwC Reviseurs d'Entreprises scrl will be available on request to Umicore's customers and stakeholders.

## Management Conclusion on Compliance

In 2024, Umicore implemented effective management systems, procedures, processes and practices regarding the due diligence of its sourcing activities of cobalt, lithium and nickel. In 2023, the updated Cobalt Framework was introduced, and new Frameworks for Lithium and Nickel were launched. 2023 was considered a transition year for the implementation of the updated/new frameworks. Through the RMI RMAP and assurance of our annual report processes, several improvements to the internal procedure were identified and implemented. As described in this report, examples include procedural updates to governance and escalation criteria, the requirements for automatic site visits linked to country risk and the country risk methodology to align across Umicore, but also internal tools were further developed and/or finetuned, such as the risk log or a KPI dashboard, to improve monitoring of our processes and outcomes.

In 2024, we had full traceability of all cobalt and 99,8% of lithium raw material, and traceability at least up to the processor for nickel, as per the respective Frameworks' requirements. A challenge encountered in 2024 related to customer-sourced materials, as a supplier category previously not in use at Umicore. While Umicore requires customers that source materials to conduct due diligence on their suppliers according to Umicore's standards, today we do not have full visibility on that due diligence. Hence Umicore needs to ensure risk is managed well through conducting its own due diligence on those suppliers (tier 2 or higher), with whom we do not have a direct relationship. This process can be more challenging due to business confidentiality and other constraints. An internal procedure is being developed to manage these processes in a more robust and proactive way going forward.

In 2024, risk assessments have been carried out diligently both on country risk and supplier risk. For all commercially contracted suppliers active in 2024 we carried out risk assessments and we are continuously working to ensure the full traceability of cobalt material. Some of the business partner screenings were performed with minor delays, however at the time of publication of this report all are completed. One challenge for the risk assessment is the lack of responsiveness on SAQs, in particular by SME suppliers who lack the resources to answer these. In those cases, we aim to gather the required information through personal engagement and market insights, in addition to our desktop review.

In 2024, site visits were performed as required by the Framework, and additional visits were conducted as part of the risk mitigation or for commercial or quality reasons.

With regard to risk mitigation, 53 new issues were logged this year and followed up on. Whereas some have been closed already, others remain open due to e.g. the systemic nature of the risk or corrective actions are ongoing. The newly installed risk score levels to determine the right governance and escalation levels were duly implemented, and high-risk issues were discussed and decided upon by senior management in the Approval Committee.

In conclusion, throughout 2024, for the 3 frameworks all due diligence steps were duly implemented as described in the frameworks. Transactional details and due diligence processes are recorded and stored.

Umicore's management system is set up in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD, 2016). By performing due diligence practices on its cobalt, lithium and nickel supply chains, receiving third-party assurance, and publicly reporting, Umicore adheres to the five steps for risk-based due diligence of the OECD Guidance.

## Other Report Comments

If users of this report wish to provide any feedback to Umicore, they can contact Barbara Cooreman, program lead responsible sourcing ([Barbara.cooreman@eu.umicore.com](mailto:Barbara.cooreman@eu.umicore.com)).

## Annex: Risk Indications and Follow-up Actions

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Issue identified	Description	Country Risk	Follow-up Action	Status
Human rights & child labour	The supplier has been mentioned in a lawsuit filed in the United States district Court regarding child labor and artisanal mining. This has been reported in different media articles. The Federal Court decided to dismiss the case in 2021. However, in 2022, a request of appeal was introduced.	High	In 2022, the Approval Committee decided to close this case based on engagement with the supplier and the dismissal of the case by the Federal Court in 2021. In 2022 an appeal was introduced and the Approval Committee re-assessed the case. After a thorough review of the allegations we closed the case, as we found the allegations unfounded. Later, the case was also dropped by the court.	Closed
Indication of torture, cruel, inhuman and degrading treatment or punishment	In 2019, media articles reported the deployment of the army to protect the concession of this supplier. Subsequently, incidents of inhumane treatment were reported to have been committed by soldiers in the area.	High	To follow-up on those allegations, Umicore commissioned a third-party audit of this supplier in 2022. The results of the audit were presented to the Approval Committee and the relationship with the supplier was maintained. In December 2023, the auditors considered all improvement actions completed. After a final review, the Approval Committee decided to close the case.	Closed
Community & Stakeholders	In a report published in September 2023 the supplier was accused of not having followed due process requirements and safeguards prescribed by international human rights standards during the eviction of farmer communities in 2017 and 2020 from their concession. Furthermore, the report claims the unlawful use of FARDC soldiers to coerce the farmers into signing inadequate compensation agreements.	High	Based on our on the ground knowledge, the allegations from the report seemed unlikely. Additionally, Umicore reached out to the supplier to ask for more details on the case. The supplier shared a statement denying and clarifying the allegations, which was in line with our on the ground information. Based on the good engagement, transparent approach and on the ground knowledge on the supplier's conduct Approval Committee decided to continue the relationship.	Closed

Labour rights	Based on NGO and media reports the supplier has a poor oversight over working conditions of contracted workers especially with regards to payment of wages, working hours and social security.	High	Umicore visited the site in Q1 2024 to verify the issue. We found that the supplier has strong management systems in place to ensure workers H&S, including contracted workers. However, they do not implement similar system to ensure labour rights of contracted workers are met. Currently the supplier is working on setting up such systems, also as part of improvements identified by Copper Mark assessment. Umicore will follow up with the supplier once the Copper Mark final report is available.	Open
Indication of bribery and corruption	Supplier is under several investigations by official authorities with regard to allegations of fraud, bribery and corruption related to the acquisition of mining assets.	High	In 2022 the supplier pleaded guilty in a SFO case on bribery charges to gain preferential access to oil in Africa, and paid a financial fine as a result. Umicore has been in continuous engagement with this supplier, who has presented the implementation of a new business & ethics program as well as a change in management and management processes related to the issue. It was decided by the Approval Committee that the progress made and assurance given by the supplier were sufficient to continue the relationship. The case will be continuously monitored through regular engagement with the supplier until at least 2025.	Closed with ongoing monitoring
Indication of environmental issues (biodiversity)	In 2012, an NGO reported that the supplier's exploitation license should not have been granted since the mine was allegedly located within a protected nature area. The presence of mining operations might impact the biodiversity in the area. The issue was put on hold as the site	High	As a volume restart was expected in 2022, the case was re-opened. The mining permit had been renewed in 2022, as the mining activities are taking place outside of the nature reserve boundaries. Umicore further engaged with the mine's management on biodiversity, environmental risk management, and water usage. In Q1 2024	Closed

	closed down for maintenance over a longer period of time.		Umicore conducted a site visit which confirmed proper environmental management systems in place including water management and biodiversity approach.	
Supplier Due Diligence	Our analysis of our supplier's supply chain has revealed potentially high risks (based on context and material)	Medium	Potential risks, especially regarding environment and health and safety have been identified in this supplier's supply chain. Umicore has conducted in-depth engagement providing capacity building material and jointly discussed and analyzed potential due diligence gaps. The supplier has agreed to include certain risk topics and specific requirements in their due diligence checks that they have not analyzed before. A follow-up call was agreed for Q1 2025.	Closed
Labour and Human Rights	During the risk assessment and based on submitted self-assessment questionnaires, three points of attention/ potential risks were identified: <ul style="list-style-type: none"> <li>1) Payments to public security forces</li> <li>2) Working conditions of contractors</li> <li>3) ASM activity on the concession</li> </ul>	High	Umicore visited the supplier in Q1 2024. Following the visits we hold regular meetings with the supplier to monitor improvements in the areas of ASM and contractors management. The supplier is also open about the management of payments to public security forces, which are done in accordance with their ethical policies and procedures. Additionally the supplier is undergoing the Copper Mark certification, which also assesses the mentioned three points and will be addressed as part of Copper Mark CAP.	Open

Environmental and labour rights	A media report pointed out several environmental and labour rights issues including inadequate provision and training on personal protective equipment.	Medium	The engagement with the supplier was started immediately after the report and is ongoing. The supplier has undergone an environmental audit and human rights and H&S audit. The supplier shared with Umicore the summary of findings, showing that the allegations were unsubstantiated. Umicore requested to see the full report for verification purposes.	Open
Community impact	Allegations were raised against this supplier concerning community impacts such as expansion on farmland and environmental pollution.	Medium	We engaged with the supplier as well as community and workers on the ground. The supplier is publicly reporting on actions taken to protect and support the local communities and on the considerable budget they are spending on local development.	Closed
Sexual Harassment	A report was published in 2022 detailing severe bullying and harassment especially against women in the Australian mining sector.	Low	We engaged with our two suppliers based in Australia to understand their approach to the issue and the measures they are taking to address them. As both suppliers publicly provided relevant action plans and updates, we were able to close this case.	Closed
Labour rights	An article reported issues with spinal injuries at a site and the dismissal of workers after work-related accidents/injuries.	High	The supplier provided insights into the measures they are taking to address this issue. Additionally Umicore team visited the supplier in Q1 2024 to interview a sample of drivers and H&S. The interviews confirmed proper H&S systems in place to manage health risks of workers on site, including drivers. Additionally the supplier went through a Copper Mark assessment, which additionally verified H&S systems in place. Issue was closed.	Closed

Labour rights	Through workers interviews conducted during a site visit we identified a risk of annual medical checks not being conducted for some of the contracted workers, grievance channels not being used and workers not being clear on their union membership.	High	During follow up meetings, the supplier's management team clarified that they are aware of these issues and these are already part of their current action plan. Supplier explained the action plan in details and the steps they are taking to address these risks. Following those meetings the supplier was certified by Copper Mark, which also assesses mentioned risks, hence the issue was closed.	Closed
Labour rights	An article reported issues with not applying collective bargaining agreement and being non-compliant with labour laws on overtime, holiday pay, and wage calculations. Article also mentions poor health and safety.	High	Umicore followed up with the supplier. The supplier clarified that the allegations were not true and have not been raised by workers internally. Umicore confirmed these clarifications during an onsite visit in Q1 2024.	Closed
Labour rights	A short note on an international union organization website informed about management inciting violence amongst workers during strike as well as other H&S and labour rights issues.	High	Umicore decided not to source from this supplier anymore.	Closed
Indication of environmental issues	As per an online report the supplier is potentially operating in a Natural Protective Area, which is in line with the local law.	High	Umicore decided not to source from this supplier anymore.	Closed
ESG policies	Some individual suppliers have gaps in their publicly available ESG policies.	High-medium-low	Umicore is addressing this issue by pro-actively engaging suppliers, providing information on Umicore's requirements and offering capacity-building support if necessary.	Open
Standard/certification	Some smaller suppliers (mines/refiners) are not yet in the process of obtaining certification against a relevant third-party audited standard.	Medium-Low	We engaged with the suppliers throughout 2024 and we offer support to help start the process.	Open

Sanctions (trade compliance)	Because of ongoing conflict in the respective region, sanctions were imposed across several jurisdictions on persons and/or companies linked to the conflict.	High	All transactions have been in compliance with sanctions regimes across relevant jurisdictions, as monitored and approved by Umicore's Trade Compliance team. Whereas Umicore has to a large extent phased out any supply flows originating in the area in question, some processed material is still received through a trader. However, none of these transactions have breached respective sanctions laws, applicable at the time of the transaction.	compliance issue: Continuous sanctions screening
Community engagement	According to media the supplier neglected their responsibility to relocate 29 families living in the area affected by their operations.	Medium	Umicore held a meeting with the Social Investment and Community Engagement team of the supplier to fully understand the issue. Supplier confirmed they are still working on the relocation, as many of the families are not willing to move due to the current compensation they receive. The supplier is implementing a number of approaches to motivate the families, such as providing a land that is more fertile than the current one and is being harvested by volunteers.	Open
Environmental impacts on local communities	Umicore received a complaint from local communities affected by operations by our suppliers. According to the community the supplier pollutes air and local waters, negatively impacting health of adults and children.	High	The supplier received an official grievance from the community related to air pollution. To respond to this concern, the supplier conducted a 3 <sup>rd</sup> party assessment focusing on air quality. The audit did not find any exceedance according to local law and suppliers' standards and has been shared publicly. Additionally, the supplier together with local environmental experts sampled water surrounding the operations. The samples were analysed by an independent	Open

			<p>lab in the UK and did not confirm any pollution.</p> <p>Umicore regularly liaises with an NGO representing the local community and currently we are waiting for a full report from the NGO providing evidence of the potential pollution by our supplier.</p> <p>As the supplier has strong environmental management systems in place verified by Umicore's team on the ground and is certified by Copper Mark, we continue the relationship.</p>	
Business Integrity	During a risk screening we found a number of online allegations against the Ultimate Beneficial Owner of the trading company Umicore sources from. The allegations referred to financing a military group, corruption, tax evasion and even contracted killings. The company issued an official statement demanding the allegations to be taken down and stating it is all fake news.	Medium	Based on the engagement with supplier we found that all the defamatory news was an extortion campaign for which the company and the owner were being blackmailed. The company shared with us evidence of court case ruling confirming their statement.	Closed
Community and environmental impacts	A media report stated that a supplier releases a toxic gas at night causing health issues at local communities.	High	The supplier provided Umicore a clear description of their air pollution and dust monitoring system, which Umicore had previously also seen during the onsite visit in Q1 2024. According to the system in place (which is also 3 <sup>rd</sup> party audited) the supplier does not release any toxic gases. The supplier is currently working on an improved communication mechanism with local communities to address potential misunderstandings around potential impacts of their operations to air and water. The supplier is also Copper Mark certified.	Closed

ASM in supply chain	During an on-site visit of a mine in Q1 2024 we identified a potential risk of external sources being used as of second half of 2024. This poses a risk of ASM material being included in the material from the mine.	High	As ASM material feed is a zero tolerance issue Umicore decided not to source from this supplier without an extensive due diligence focusing on the sourcing. Currently Umicore does not source from this supplier.	Closed
Environment and H&S	A number of media reports stated poor environmental impact management and H&S risks of a supplier.	Medium	Umicore held two meetings with the site's management to discuss each of the allegations and understand what systems they have in place to manage these risks. During the meetings the supplier also provided evidence of systems in place, e.g. air monitoring report. At the moment the issue is on hold, as we do not source from the supplier currently.	On hold
Business Integrity	Media reports have emerged accusing this supplier of using funds of its foundation to influence the elections in that country and secure political favours.	Medium	The supplier was engaged and has provided initial comments. The investigations are ongoing and are being closely monitored.	Open
Business Integrity	This former supplier was indirectly owned by an individual who is on the sanctions list of several countries.	Low	While there were no legal issues with the situation, there were still questions about business integrity. The supplier was engaged and provided further information. As there is no current or near-term future sourcing planned, this case was closed.	Closed
Supply Chain/ Environment	Several years old media reports on environmental issues were found for multiple mine sites of this supplier.	Medium	The supplier was engaged and provided satisfactory feedback. All relevant sites have obtained the Copper Mark (which also covers environmental aspects) in the meantime.	Closed
Business Integrity	Historic corruption case ongoing in another business division related to bribery by salespeople.	Medium	The case was settled and after a meeting between the supplier and our Corporate Security team we agreed to continue business.	Closed

Labour rights	This supplier had begun to create a Joint Venture in a region with high forced labor risk.	High	After pressure from Umicore and other buyers, the company agreed to shut down the JV and provided proof to this effect.	Closed
Health and Safety	Workers went to hospital due to exposure to chemicals on-site. This was in a low risk region.	Low	We discussed this with the supplier and were satisfied with the presented mitigation plan.	Closed
Communities - FPIC	Some communities have not signed up to the agreement with the producer to give permission for mining.	Medium	Discussed with the supplier. They are facing some resistance due to this community being closer to another company site's operations. Supplier and communities are in constant dialogue and the majority of communities have given permission.	Closed with ongoing monitoring

**Annex:** Frameworks for the Sustainable Procurement of Cobalt, Nickel and Lithium (applicable from 01/01/2023)