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Responsible Sourcing Policy

Description	Position	Name	Signature	Date
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1. **Purpose**

The purpose of this Responsible Sourcing Policy is to establish a framework for the ethical and sustainable procurement of goods and services. This policy aims to ensure that our supply chain aligns with our company's values and commitments to environmental, social, and governance (ESG) principles, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2. **Objectives**

1. **Ethical Sourcing:** To source products and services from suppliers who adhere to ethical business practices, including fair labor standards, human rights, and worker safety. Specifically, we are committed to zero tolerance for modern slavery, child labor, forced labor, unfair labor practices, human trafficking and exploitation.
2. **Environmental Sustainability:** To minimize the environmental impact of our supply chain by promoting sustainable practices, energy efficiency, waste reduction and compliance with local environmental regulations, as well as, create a mindset of Zero Harm.
3. **Social Responsibility:** To contribute to the social and economic development of the communities where our suppliers operate, including prioritizing local and diverse suppliers.
4. **Transparency and Accountability:** To maintain transparency and accountability in our supply chain by conducting assessments and audits of suppliers.
5. **Risk Mitigation:** To identify and mitigate potential risks associated with our supply chain, including supply chain disruptions, reputational damage and legal liabilities.
6. **In-Country Value:** To maximize the economic benefits to the Sultanate of Oman through the development of local suppliers.
7. **Anti-Bribery and Corruption:** To maintain the highest standards of ethical behavior and to prohibit bribery and corruption in all its forms.
8. **Anti-Money Laundering:** To comply with anti-money laundering regulations and to prevent the use of our supply chain for illicit financial activities.
9. **Human Rights:** To respect and protect human rights throughout our supply chain, including the rights of workers, consumers and communities.
10. **Environmental Protection:** To minimize the environmental impact of our supply chain and to promote sustainable practices.
11. **Business Continuity:** To ensure the continuity of our supply chain operations and to minimize the impact of disruptions.

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12. **ESG Standards:** To adhere to relevant ESG standards and frameworks, such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the ISO 26000 standard.
13. **OECD Due Diligence Guidance:** To comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, ensuring that our supply chain is free from minerals that finance conflict and human rights abuses. SA will implement due diligence systems to ensure that the minerals sourced will not be having the concerns related to –
    - Serious absuses(such as torture, inhuman and degrading treatment; forced or compulsory labour; child labour; human rights violations and absues such as widespread sexual violence ; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
    - Direct or indirect support to non-state armed groups
    - Direct or indirect support to public or private security forces.
    - Bribery and fraudulent misrepresentation of the origin of minerals
    - Money laundering.

    Non-payment of taxes, fees and royalties to governments.

3. Scope

This policy applies to all departments and employees involved in the procurement process, including the Supply Chain Management Department, User Departments, Senior Management and Committees. It covers all direct and indirect suppliers, contractors and service providers.

4. Accountabilities

4.1 Supply Chain Management Department

- **Supplier Selection and Due Diligence:**
    - Prioritize suppliers who demonstrate strong commitment to ESG principles and In-Country Value.
    - Implement due diligence process which involves checking suppliers' compliance to the requirements. These will include their compliance with ESG requirements, Human rights compliance requirements, and additional requirements as stated in the OECD Due Diligence Guidelines for the responsible supply chain of minerals from conflict-affected and high-risk areas. The checks should specifically address all the concerns related to the non-state armed groups, illegal private and public security forces, possibility of misrepresentation of mineral origins, and government payment linked to mineral

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activities. Prioritise these checks on suppliers who are not part of any recognized certifications, such as ASI, RMI, etc.

- Collaborate with other smelters in the region to gather the data of supplier due diligence audits and evaluate the findings. This sharing of information helps to qualify the supplier and learn from others' experiences with these suppliers.
- Implement the supplier due diligence checks to evaluate if there are any legal and reputational risks associated with a supplier.
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- **Supplier Performance Management:**
  - Follow up audits to be conducted on suppliers based on the reports of the due diligence audits. Suppliers with recognized certifications need not be part of this follow up audit process.
- **Supplier Development:**
  - Work with suppliers to improve their sustainability performance through training, capacity building, and technical assistance.
- **Grievance Mechanism:**
  - Establish and maintain a clear and accessible grievance mechanism for workers and other stakeholders to report concerns related to labor rights, working conditions, and other ethical issues.
- **Whistleblower Protection:**
  - Implement a robust whistleblower protection policy to encourage the reporting of wrongdoing and to protect whistleblowers from retaliation.
- **Environmental Impact:**
  - Consider the environmental impact of sourcing decisions and promote sustainable practices, such as reducing waste, minimising carbon emissions, and conserving resources.

4.2 **User Departments**

- **Supplier Approval:**
  - Technically review and approve suppliers in accordance with the company's procurement policies and procedures, ensuring compliance with this Responsible Sourcing Policy and the Supply Chain Management Policy Framework.

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5. **Cross-References**
   - **Human Rights Policy:** This policy reinforces the company's commitment to human rights, as outlined in the Human Rights Policy, by ensuring that suppliers adhere to international labor standards and human rights principles.
   - **Fraud Risk Policy:** This policy complements the company's Policy Framework - Fraud Risk Policy by addressing potential risks associated with corruption, bribery, and other fraudulent activities in the supply chain.
   - **EHS Policy:** This policy aligns with the company's Environment, Health, and Safety (EHS) Policy by promoting sustainable practices, minimizing environmental impact, and ensuring worker safety and health throughout the supply chain.
   - **Supply Chain Management Policy Framework:** This policy is aligned with the company's Supply Chain Management Policy Framework, which provides a comprehensive framework for procurement, logistics, and warehousing operations.

By adhering to this Responsible Sourcing Policy, Sohar Aluminium aims to build a strong, sustainable, and ethical supply chain that benefits both the company and society as a whole.

End of Policy Document

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