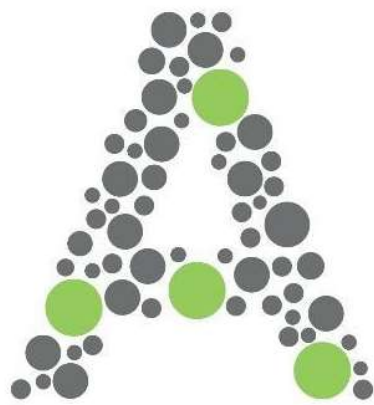


CODE OF ETHICS | AFAI CONSULTING BV



Afai Consulting

March 2024



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SCOPE OF OUR CODE OF ETHICS

Our Code of Ethics applies to all members of our management and team, including consultants, as well as suppliers. All actors must ensure that the guidelines established here prevail in all relationships established within the realm of the company and its projects.

OUR UNDERSTANDING OF ETHICS

At Afai Consulting BV, our ethics are based on our purpose and on a set of values and principles that guide our actions towards others, always aiming to behave in a way that is right and consistent towards the people we relate with and the territories we work in.

OUR PURPOSE

To generate knowledge, information, alliances and networks that support the better governance of natural resources around the world and help to scale up and strengthen responsible mineral supply chains.



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OUR PRINCIPLES

To uphold and promote in all situations the [Universal Declaration of Human Rights](#), including the [United Nations' resolution A/RES/76/300 \(2022\)](#) that defines the access to a clean, healthy and sustainable environment as an universal human right.

To always take into account, in our reflection, learning and action, international legal instruments and tools that promote responsible business conduct and responsible sourcing and which include processes to ensure meaningful consultation with potentially affected groups and other relevant stakeholders (such as the [OECD's Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)).

These principles result, but are not limited to, specific commitments to:

No child labour

It is forbidden for our management, teams and contracted external consultants, to hire any underage employee or consultant to work at the company's offices. It is also forbidden to contribute to the worst forms of child labour in the territories where the company is implementing projects¹.

¹ The criteria used to identify what is considered underage will be the one established by the applicable national legislation. The criteria to identify the worst forms of child labour are set in the [ILO Convention of 192 of 1999](#).



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If the team or company consultants identify any situation, or have any suspicion, of child labour of any type in other organizations that they are in contact with, because of their work at Afai Consulting BV, they have the obligation to alert management who shall log the incident in its *Human Rights infractions and grievances logbook* and decide on an appropriate course of action.

No forced labour

It is forbidden for our management, teams and contracted external consultants, to contribute to any kind of forced or compulsory labour² at the companies offices or in the territories where we are leading or being part of projects.

If the management, team or company consultants identify any situation, or have any suspicion, of forced labour in other organizations that they are in contact with, because of their work at Afai Consulting BV, they have the obligation to alert management who shall log the incident in its *Human Rights infractions and grievances logbook* and decide on an appropriate course of action.

Adequate working conditions

Taking into account our purpose, principles and values, we expect that all employees and consultants have the right to:

- a working environment that is healthy and safe, which includes individual protective equipment when needed,
- freedom from moral or sexual harassment
- adequate working hours and time off
- adequate pay

² The criteria used to identify what is considered forced labour are set in the [Forced Labour Convention, 1930 \(No. 29\)](#).



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- freedom of speech
- freedom of association and collective bargaining
- respect to one's religion, sexual orientation, gender identity and any other personal biological factors, characteristics and/or choices.

No contribution to fraud, economic crimes or financing of terrorism

Our management, employees and consultants are forbidden to accept any improper and/or illegal arrangement with organizations (public or private) that can be considered corrupt; as well as any form of bribery which includes, but is not limited to: gifts of a value over 50 euros, loans and/or personal benefits that may compromise our impartiality in decision making; or that can lead to the selection in hiring processes; or that can result in economic advantages in business, like agility or preference in procedures.

In addition, all diligence and care are taken to prevent our management, employees, consultants, projects and our company as a whole from being involved in any criminal activity that can result in money laundering or the financing of terrorism.



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OUR VALUES

We are **COMMITTED TO UNDERSTANDING AND NOT JUDGING REALITIES**. We strive to not only bring from the field the information our clients require but also to bring back the contextual understanding that allows our clients to understand the intricacies at play and gives a voice to those that are often excluded from the dialogue.

We believe in **TRANSPARENCY** when trying to find paths for positive impact. We are open to information shortcomings and openly disclose any possible bias we may have.

We **RESPECT AND PROTECT OUR SOURCES**. Whether in the field or during remote consultations, we always ensure that our sources can confide in us and that they know that their personal data will not be shared and that others won't be able to trace back to them any finding.

We **RESPECT DIVERSITY IN ALL ITS FORMS**. We encourage the participation of all persons in our work and strive to ensure the representation of the diversity of stakeholders of mining sectors in our data collection.



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ENFORCEMENT OF OUR CODE OF ETHICS

If any of our stakeholders identifies that the Company or its management, employees, or contractors are in violation of this Code of Ethics specifically or acting in any form that may be perceived as inappropriate from the standpoint of human rights, social, labour, community or environmental rights they can contact us at: info@afaiconsulting.com or send an anonymous message through the contact section on our site: www.afaiconsulting.com.

All complaints received will be logged into our *Human Rights infractions and grievances logbook*, assessed and if irregularities are found, action will be taken.

If desired by the complainant, we are committed to communicating³ the results and methods of our assessment, as well as actions taken in response.

³ Note that communication regarding the complaint received requires us to receive an email address we can respond to when contacted anonymously via the content section of our website. In which case we encourage the complainant to set up a dedicated anonymous email to preserve their anonymity if so desired.