



PRESS METAL ALUMINIUM HOLDINGS BERHAD

Registration No. 201601027232 (1198171-H)

RESPONSIBLE SOURCING POLICY

Term & Definitions:

The following abbreviations and definitions shall apply throughout this Policy.

Term	Definition
ASI	: Aluminium Stewardship Initiative
CAHRAs	: Conflict-Affected and High-Risk Areas
Child Labour ¹	: Work that deprives children of their childhood, their potential, and their dignity, and that is mentally, physically, socially or morally dangerous and harmful to their development. It is work that interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work. <i>“Child” is defined in accordance with the local laws where the operations locate.</i>
Gross Human Rights Violation ²	: Gross Human Rights Violation comprises at least one of the following acts: <ul style="list-style-type: none"> • Torture and cruel, inhuman, and degrading treatment or punishment; • Summary or arbitrary execution; • Forced or involuntary disappearance, or arbitrary and prolonged detention; • Apartheid, discrimination based on gender, race, nationality, ethnicity, language, culture, or religion; • Human trafficking, slavery, or slavery-like practice; • Foreign occupation or alien domination; • Terrorism; • Lack of the rule of law; • Denial of access to education, food, or other socio-economic rights; • Denial of access to free expression, public affairs, and services of the country; and • Destruction of properties or looting of a community's natural resources

¹ International Labour Organisation (ILO).

² Roger-Claude Liwanga, The Meaning of Gross Violation of Human Rights: A Focus on International Tribunals' Decisions over the Democratic Republic of the Congo Conflicts, 44 Denver Journal International Law & Policy, 2015.

Term	Definition
Human Rights ³	: Agreed international standards that recognize and protect the inherent dignity and the equal and inalienable rights of every individual, without any distinction as to race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status.
OECD	: Organisation for Economic Co-operation and Development
OECD Guidance	: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
Management	: All Directors and senior management teams within the Group
Mineral	: Mineral containing ore in any physical form, extracted through mining of geological deposits, processed to higher grade mineral concentrate, and used in a primary processor to produce metal-products for refining.
PMAH or the Company	: Press Metal Aluminium Holdings Berhad (Company No. 201601027232 (1198171-H))
Press Metal or Group	: The Company and its subsidiaries, collectively.
SCoC	: Supplier's Code of Conduct
UN	: United Nations
Voluntary Principles on Security and Human Rights	: Principles that guide companies in conducting a comprehensive human rights risk assessment in their engagement with public and private security providers, to ensure human rights are respected.

³ Universal Declaration of Human Rights.

1. Introduction

Press Metal is committed to responsible sourcing by taking into consideration ethical, environmental, and social aspect of our suppliers including Human Rights; and by avoiding contribution to the finance of conflict when dealing with our suppliers.

Our approach to responsible sourcing is formulated with reference to ASI Performance Standard Version 3 and implements the five (5) steps framework of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”).

2. Objective

This Policy establishes principles and guidance of responsible sourcing in the procurement activities towards achieving Group’s business objectives, code of conduct, ethical stance, compliant to applicable laws and regulations, and expectation from related stakeholders.

3. Scope and Target Audience

The Policy applies to the Management and relevant employees of Press Metal, who are involved in procurement activities within the Group. We require our suppliers to act in a manner consistent with the intent of this policy.

4. Commitment and Expectation

Press Metal has set forth the commitment and expectations in this Policy and expects our suppliers adhered to. We expect our suppliers, when working with Press Metal, to act in a manner consistent with this Policy as well as Supplier Code of Conduct (“SCoC”). Additionally, we encourage our suppliers to set expectations for their own suppliers in their business dealings.

Press Metal has established and implemented a supplier’s management system which consists of supplier due diligence, selection and monitoring, through to disengagement. In addition, for procurement of minerals, we practice the five (5) steps framework of OECD Guidance. We require our suppliers to monitor their own suppliers at their own capacity.

Press Metal commits to refraining from any action which contributes to the financing of conflicts and commits to comply with the relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

(a) Compliance with All Applicable Legislation, Regulations and Laws

We require our supplier to comply with all applicable laws and regulations in its own business activities and in its business relationships with suppliers at a local, national, and international level.

(b) Serious Abuses Associated with the Extraction, Transport or Trade of Minerals

While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate, nor profit from, contribute to, assist or facilitate by any party the commission of:

- i. Torture, cruel, inhuman and degrading treatment
- ii. Forced or compulsory labour
- iii. Child Labour
- iv. Gross human rights violations and abuses such as widespread sexual violence
- v. War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

(c) Direct or Indirect Support to Non-State Armed Groups

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals including, but not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i. Illegally control mine site or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii. Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded, and/or
- iii. Illegally tax or extort intermediaries, export companies or international traders.

(d) Public or Private Security Forces

We recognise that the role of public or private security forces is to maintain the rule of law, safeguard Human Rights, provide security to workers, equipment and facilities, and to protect mine sites or transportation routes from interference with legitimate extraction and trade.

Where Press Metal contract public or private security forces, we commit that such security forces will be engaged in accordance with the Voluntary

Principles on Security and Human Rights or Press Metal's Human Rights Policy. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will not provide direct or indirect support to public or private security forces that commit abuses described in paragraph 4(b), or that act illegally as described in paragraph 4(c).

(e) Bribery and Fraudulent Misrepresentation of the Origin of Minerals

We prohibit any offer, promise, give or demand bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, or to misrepresent the taxes, fees and royalties paid to governments for the purposes of extraction, trade, handling, transport and export of minerals.

(f) Money Laundering and Payment of Taxes, Fees and Royalties Due to Governments

We will not support nor tolerate money-laundering activity(s) resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded.

(g) Payment of Taxes, Fees and Royalties Due to Governments

We expect that all taxes, fees, and royalties related to minerals supplied to Press Metal are paid to governments and we expect our suppliers to encourage their mineral suppliers to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative.

5. Due Diligence Exercise

To ensure compliance with this Policy and SCoC, Press Metal may, at our discretion, carry out assessment on our supplier in form of assessment surveys, onsite and/or offsite audits and/or inspection.

6. Violation of Responsible Sourcing Policy

Where we find instances of non-compliance of this Policy or SCoC, we will investigate these incidents to understand the causes, and we take appropriate action accordingly. Press Metal will seek to work with the supplier to ensure a sustainable corrective and mitigating action plan has been implemented prior to

the recommencement of purchases and reserves its right to reconsider its relationship with the supplier. In the absence of a sufficient and evidence-based rectification of the issue identified within the agreed timeframe, Press Metal may review the continuity with the supplier and reserves its right to terminate its relationship with the supplier.

7. Grievance Mechanism

The Group is committed to managing a grievance mechanism which allows stakeholders to raise grievances if any, without fear of retaliation. Press Metal grievance mechanism will align with United Nations Guiding Principles on Business and Human Rights criteria for effective and non-judicial grievance mechanisms: legitimacy, accessibility, predictability, equitability, transparency, rights-compatible, a source of continuous learning, and based on engagement and dialogue.

The Group is committed to an open and transparent process where all grievances will be dealt with fairly and in a timely manner. Press Metal's operations shall establish a confidential grievance mechanism which is available to our stakeholders e.g., suppliers and other related individuals to raise concerns.

Further, the Company has established a Whistle-Blowing Policy that provides an anonymous, secure and confidential communication channel for all stakeholders to raise genuine concerns or report any misconduct or wrongdoings. The provision, protection and procedure of the Whistle-Blowing Policy are available on the Company's portal.

8. Periodic Review

This Policy should be reviewed periodically by the Company in accordance with the needs of the Group or at least every 5 years from the date of adoption.

This Policy shall be made available at the Company's website.

Adopted by Board: 24 February 2023