


	STANDARD POLICY	Document ID	TNCL-PRO-POL-0006
		Document owner	CHRO
	MINIMUM SUPPLIER COMMITMENTS POLICY	Revision	00
		Approve Date	13 th January 2026

MINIMUM SUPPLIER COMMITMENTS

This document states our expectations for business conduct from all suppliers wishing to do business with, or on behalf of, Tembo Nickel Corporation Limited (TNCL). It should be read in conjunction with the TNCL Code of Conduct and Business Ethics, which applies to all of our employees, officers and directors, and to our partners and suppliers when they are working with us or on our behalf. We define a ‘supplier’ as a business or individual that provides goods or services to TNCL, and expect suppliers and their sub-contractors to review, understand and comply with this document. Where there are areas of weakness or non-compliance, suppliers are expected to develop and execute a remedial improvement plan (with support as necessary support) as well as report any material incidents and/or breaches of laws and regulations promptly to TNCL.

We seek to build mutually beneficial working relationships and partnerships with our suppliers through the development and continual improvement of processes and systems that address the expectations of this document and will show preference for those suppliers who are able to demonstrate alignment with these expectations.

Business Conduct	Commitment
Laws and regulations	The supplier must comply with the letter and, where it is clear, the intent of all laws and regulations relating to their business. This includes understanding laws and regulations relevant to their work and complying with the legal requirements of the country where they are working. If the local law allows an activity, practice or standard that is not permitted under TNCLs’ requirements for suppliers, the supplier must exceed legal requirements.
Anti-bribery & corruption, sanctions and extortion	The supplier must comply with applicable anti-bribery and corruption laws. The supplier must not make or allow facilitation payments when undertaking work for or on behalf of TNCL. The supplier must comply with all international trade and sanctions laws of the countries in which TNCL operates. The supplier must maintain policies and practices to allow violations, misconduct, or grievances to be reported by workers and addressed without fear of retaliation.
Health, safety, security, environment & community	The supplier must comply with TNCLs’ health, safety, security, environment and community requirements relevant to work performed as part of the supply contract with TNCL.

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Conflict of interests and political exposure	<p>The supplier must ensure that personal activities and interests, and those of employees and subcontractors, do not conflict with their responsibilities to TNCL.</p> <p>The supplier must comply with internal sanction law and flag to TNCL if shareholders or key management personnel are politically exposed people or are (were recently) sanctioned.</p> <p>TNCL’s “Politically Exposed Person Policy” is available on request.</p>
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Cybersecurity and data protection	<p>The supplier must:</p> <ul style="list-style-type: none"> ○ Affirm that it manages cybersecurity, data protection, and personal data to good industry practice and in accordance with relevant data protection and data privacy laws; ○ Maintain a risk assessment covering cybersecurity, data protection, and personal data; ○ Apply, with proportionality, a cybersecurity program that identifies and remediates weaknesses as a matter of routine. ○ Be able to demonstrate ongoing commitment to managing cybersecurity and data protection risk.
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Human Rights	Commitment
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Human Rights	<p>The supplier is expected to respect the human rights of workers and others who may be impacted by its activities. The supplier acknowledges they have been provided with TNCLs’ Human Rights Policy and Human Rights Policy Statement; and that they have policies and procedures in place to meet these requirements, including in relation to assessing and addressing the human rights risks and impacts in their operations and supply chain.</p>
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Sexual Harassment	<p>The supplier must create and maintain an environment that treats all employees with dignity and respect and must not use or threaten violence, coercion, sexual exploitation or abuse, or verbal or psychological harassment or abuse.</p> <p>As part of their obligations to ensure a safe workplace, the supplier must:</p> <ul style="list-style-type: none"> ○ Provide a work environment free from sexual harassment; ○ Provide a mechanism to enable reporting of sexual harassment; ○ Have in place processes for the investigation of allegations of sexual harassment and participate in any investigation of sexual harassment reports as required; ○ Provide support to persons who report or are impacted by incidents of sexual harassment connected in any way to workers or the business of the supplier; ○ Have in place processes for appropriate action (including disciplinary action and removal from the workplace) to be taken against persons found to have engaged in sexual harassment; ○ Regularly review the adequacy of control measures to address risks of sexual harassment; and ○ Ensure that all workers, including sub-contractors engaged by them, are made aware of Lifezone Metals' approach to sexual harassment and receive training in appropriate workplace behaviour and reporting mechanisms.
Child labour	<p>Children must not be hired to work before completing their compulsory education (as determined by applicable local laws). Notwithstanding local requirements, the minimum age for entry into employment must not be younger than 15 years of age.</p>
Forced or compulsory labour	<p>The supplier must affirm that it does not allow forced, bonded or involuntary labour or any other kind of modern slavery.</p> <p>The supplier must comply with TNCL's Modern Slavery Act Statement.</p>
Human trafficking	<p>The supplier must affirm that it does not use labour acquired through human trafficking.</p>

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Freedom of association	<p>The supplier must:</p> <ul style="list-style-type: none"> ○ Adopt an open attitude towards the legitimate activities of trade unions; ○ Allow their workers’ representatives to carry out their legitimate representative functions in the workplace and not be discriminated against.
Wages, penalties and working hours	<p>Wages and benefits paid must satisfy, at a minimum, national legal standards or local industry benchmarks, whichever is higher. In nation states where no minimum wage legislation exists, the supplier must seek to establish a living wage that provides an adequate standard of living for all its employees and their dependents. The supplier must not deduct allowances or withhold wages as a disciplinary measure or for any other reason that is not permitted by law. Performance-based pay systems must be calculated based on reasonable expectations and be clearly defined and communicated. Working hours shall not exceed the national legal standards or local industry benchmarks, whichever provides greater protection for the worker.</p>
Diversity and inclusion	<p>The supplier must:</p> <ul style="list-style-type: none"> ○ Provide a work environment in which everyone is treated fairly and gender, cultural, ethnic, religious or other diversity factors, such as disability, are respected. ○ Offer employment based on merit; ○ Not base decisions regarding employment on attributes unrelated to job performance (including but not limited to, race, colour, gender, religion, personal associations, national origin, age, disability, political beliefs, marital status, sexual orientation and family responsibilities). Decisions relating to suppliers, customers, contractors and other stakeholders must also be based on merit or otherwise non-discriminatory.

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Workplace health and safety	<p>The supplier must provide:</p> <ul style="list-style-type: none"> ○ Safe and healthy working facilities and appropriate precautionary measures to protect employees from work-related hazards and anticipated dangers in the workplace; ○ Workers with regular and recorded health and safety training; ○ Clean and safe accommodation that meets the basic needs of the workers (where provision is applicable). <p>The supplier must:</p> <ul style="list-style-type: none"> ○ Follow all relevant legislation, regulations and directives in the countries in which the contract activities are undertaken to provide a safe and healthy workplace; ○ Conduct appropriate risk assessments and hazard and operability studies; ○ Provide the right personal protective equipment to prevent injury and long-term illness; ○ Implement systems for the prevention of occupational injury and illness, including standards for fire safety; occupational or industrial hygiene standards; appropriate lighting and ventilation; machinery safeguarding; reasonable and appropriate access to potable water and sanitation facilities; ○ Must implement adequate emergency preparedness and response plans for safeguarding their employees, operations, and security of supply in times of ○ Natural events, major catastrophes, pandemic diseases, and unforeseen events; ○ Must have comprehensive reporting and investigation procedures for health and safety incidents, occupational injuries and illnesses; ○ Assign responsibility for health and safety to a management representative.
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Community	Commitment
Community Interaction	The supplier, and in turn its employees, must treat members of the community with dignity and respect. They must not adversely impact on the health or safety of members of the community, nor on their wellbeing by engaging in activities such as threatening behaviour, violence, coercion, sexual exploitation or abuse, or verbal or psychological harassment or abuse.
Security	The supplier must ensure that any public or private security forces engaged manage security in a way that is lawful and respects the fundamental freedoms and human rights of all stakeholders.
Environment	Commitment
Environment	The supplier acknowledges they have been provided with TNCL's Environmental Policy, included in the TNCL Code of Conduct and Business Ethics and that they have policies and procedures in place to meet these requirements.
Environmental Approach	Lifezone Metals seeks to avoid, minimise, mitigate, and/or remediate negative impacts on the environment and proactively manage risks. Our suppliers shall conduct activities in an environmentally responsible manner, including meeting all legal requirements for water and air emissions, pollution controls, chemical and waste management. Our supplies continuously improve their environmental and resource management – reduce, reuse and recycle.
Environmental reporting	Our suppliers share our commitment to the environment by measuring and reporting environmental data in accordance with applicable laws, regulations and widely accepted international environmental standards, and are open to sharing the same with TNCL.
Remedies	Commitments
Access to grievance	The supplier is expected to establish and maintain a trusted and accessible mechanism to allow workers to raise complaints, and a process to consider,
Processes and remedies	manage and remedy complaints, which ensures no retaliation towards complainants.
Supply Chain	Commitments

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Supply chain	<p>The supplier must ensure to the maximum extent possible the application of the expectations in this document along their own supply chain and with their own suppliers, making diligent efforts to understand, identify and manage any areas of risk, as well as recording and reporting all credible allegations against it of human rights (including labour) abuses, violations of international human rights laws and standards and/or breaches of laws and regulations promptly to TNCL.</p>
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Benedict Busunzu
CEO - Tembo Nickel.