



Pure Battery Technologies Limited ACN 621 530 185

## Responsible Minerals Sourcing Policy EC012

### Document History:

Revision	Issue reason	Approved Date
0	Creation and first issue of Policy	January 2026

Policy next Review Due Date: January 2028

### *Policy applicability:*

*This policy applies universally to all companies, subsidiaries, and affiliated entities under PBT corporate structure. It is imperative that all personnel and operations within these organizations adhere to the guidelines outlined in this document. This ensures a consistent approach and compliance across all levels of the organization.*

## 1. Background and Purpose

Pure Battery Technologies Pty Limited and its subsidiary companies (collectively “PBT”) are committed to responsible sourcing of minerals, specifically Nickel (Ni), and in the future Cobalt (Co), Manganese (Mn), Lithium (Li). We are committed to sustainable growth and recognise the responsibility that comes with sourcing minerals ethically.

The purpose of this policy is to ensure that minerals used in our products are sourced in a way that respects human rights, avoids contributing to conflict, and complies with all relevant regulations and customer expectations, including any relevant United Nations sanctions resolutions, OECD Due Diligence Guidelines, Regulation (UE) 2017/821 and our own Code of Conduct and internal policies. This policy supports our broader sustainability strategy and our commitment to ethical, transparent, and responsible business practices.

## 2. Scope

This policy applies to all employees, contractors, suppliers, and business partners involved in the sourcing, procurement, handling, or trading of minerals within PBT's supply chain globally. It encompasses both direct and indirect sourcing activities and applies across all business units and geographic locations.

This policy applies to all minerals and metals used as primary materials in our value chain, including both raw, refined and recycled sources. Specifically, it covers:

- Critical minerals and metals such as nickel, cobalt, lithium, graphite, and others integral to our production.
- All derivatives, intermediates, and processed forms of these materials, including but not limited to Mixed Hydroxide Precipitate (MHP), off-spec materials and metal sulphates.
- Recycled materials that contain relevant metals of concern, such as black mass from end-of-life batteries.

This scope aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

## 3. Commitment to responsible sourcing

PBT are committed to:

- Source only minerals that meet regulatory requirements and industry standards, throughout the supply chain.
- Comply with applicable laws and regulations including those related to conflict minerals and critical raw materials.
- Comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.
- Implement and promote responsible sourcing across our supply chain.

- Refrain from any actions, including sourcing minerals, that contribute to conflict, financing of conflict, human rights abuses, or unethical labor practices.
- Promote transparency and traceability across the full life cycle of the minerals we process, from origin to final product.
- Disclose taxes, fees, and royalties paid to governments in line with the principles set forth in the Extractive Industry Transparency Initiative (EITI), where applicable.
- Never offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals.

#### **4. Zero tolerance to serious abuses**

In all cases, and particularly if sourcing from or operating in conflict-affected and high-risk areas, PBT will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission of the following serious abuses by any party:

- any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labour, which means work or service, which is extracted from any person under the menace of penalty and for which said person has not offered themselves voluntarily;
- the worst forms of child labour, as defined in the International Labour Organisation Convention n°182;
- other gross human rights violations and abuses such as widespread sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

#### **5. Zero tolerance to support to non-state armed group and public or private security forces associated with the extraction, transport or trade of minerals**

PBT will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Such support includes, but is 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:

- illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- 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
- illegally tax export companies or international traders.

PBT will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering 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 by upstream suppliers.

PBT will not support any unlawful public or private security forces according to the terms below:

- agree to eliminate direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
- recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
- where PBT or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights 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.

## **6. Suppliers expectations**

PBT aims to build long-term, collaborative partnerships with reliable suppliers who demonstrate a consistent track record of responsible sourcing, regulatory compliance, and ethical business conduct. Preference is given to suppliers who align with our values and support continuous improvement across the supply chain.

Our operations (both wholly owned and owned in part) are implementing systems and processes to ensure they are working with responsible suppliers.

Our suppliers are expected to meet our standards for ethical business practices, health, safety, human rights and environmental governance. This includes:

- Comply with all applicable laws, regulations and industry requirements to address any potential risks of human rights related challenges within their supply chain
- Comply with our Code of Conduct, our Anti-bribery policy and the standards set forth in this policy.
- Refrain from sourcing from entities known to be linked to human rights abuses, conflict financing, or corruption.
- Cooperate in risk assessments, audits, and corrective actions.
- Provide complete and accurate sourcing disclosures through the Extended Minerals Reporting Template (EMRT) yearly.

PBT recognise the complexities and evolving challenges of implementing responsible sourcing practices across the mineral supply chain — both within its own operations and for its suppliers. As part of our commitment to continuous improvement, we will progressively strengthen our due diligence processes to address these risks. In the short term, given the limited number of suppliers in our supply chain, PBT will source from industry-recognised entities that have been audited by credible third parties and are listed as “compliant” in the Responsible Minerals Initiative (RMI) facility database.

## **7. Consequences of Breaching this Policy**

Suppliers and partners are expected to fully adhere to the principles outlined in this Responsible Sourcing Policy. Any actual or suspected breach, including involvement in prohibited practices, or misrepresentation of sourcing information, may result in corrective action, up to and including suspension or termination of the business relationship.

PBT will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses or providing direct or indirect support to non-state armed groups, as defined in Section 4 above.

Breach of this Policy by Personnel will be regarded as serious misconduct, leading to disciplinary action which may include termination of employment.

Breach of this Policy by a Business Associate will be regarded as a material breach for the purposes of termination of the agreement with the Business Associate.

## **8. Review Frequency**

Considering the rapid evolution along the supply chain, this policy will be reviewed every 2 years.