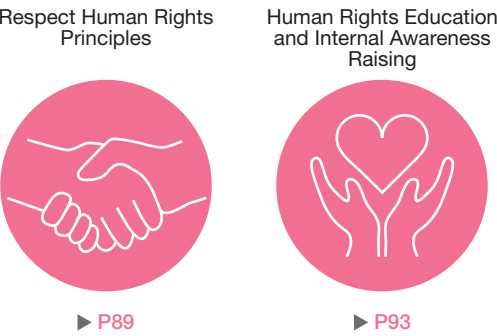


Materiality 4 Respect Human Rights

The JX Nippon Mining & Metals Group sees maintaining sound business practices while respecting the human rights of local residents, customers, employees, business partners and all others involved in the supply chain as a major premise for our continued operation. Based on this belief, we aim to conduct our business with due consideration for human rights, using opportunities like briefings and interviews, and to create a corporate climate where human rights are respected.



KPIs and Progress

Assessment: 😊 Achieved / Steady Progress 😞 Not Achieved

KPI	Fiscal 2021 Results/Progress	Assessment
Percentage of employees taking human rights training (100% in fiscal 2021)	In addition to stipulating respect for human rights in the Group Code of Conduct and other internal rules, we continue to carry out human rights training and e-learning programs at Group companies to raise awareness of human rights and prevent human rights violations. In fiscal 2021, 100% of officers and employees participated in our ongoing human rights training programs.	😊
Conduct survey of human rights in supply chains	We have established and operate a supply chain due diligence management system in accordance with OECD guidance for procurement of raw materials. In fiscal 2021, we underwent external audits related to gold, silver, and tantalum, as well as new external audits for platinum and palladium. These audits determined that we were taking appropriate action. We also conducted a CSR Questionnaire of suppliers at the Caserones Copper Mine in Chile.	😊

Respect Human Rights Principles

The Group is committed to advancing human rights due diligence and addressing human rights issues in accordance with internationally-recognized guidance and the fundamental principles of the International Council on Mining and Metals (ICMM), and in keeping with the intent of the RBA Code of Conduct.

Initiatives for Human Rights in the Supply Chain

In accordance with the Basic Policy on Procurement, the Group conducts checks with its suppliers about issues such as ensuring worker rights, the presence of discrimination in hiring and work, forced labor and child labor, and compliance with prohibition against purchasing conflict minerals. In addition, from fiscal 2019, we launched the CSR Purchasing Questionnaire

Surveys to ensure that our entire supply chain practices respect for human rights, occupational health and safety, compliance, environmental conservation, and other initiatives to fulfill our social responsibilities.

In fiscal 2021, we conducted a CSR Procurement Questionnaire for 17 overseas suppliers. We provide feedback to our suppliers based on the results of this survey, taking care to prevent infringements of human rights in our supply chain.

JX Nippon Mining & Metals Group Basic Policy on Procurement (excerpt)

- 4. Follow the below principles regarding conflict minerals
 - Do not engage in raw materials procurement that contributes to illegal activities in conflict-affected regions or to human rights violations resulting from such activities.
 - Respect the guidance of the Organisation for Economic Co-operation and Development (OECD) related to raw materials procurement from conflict-affected areas, and control supply chains in an appropriate manner.

Policy for Selecting Procurement Partners

In the conduct of the JX Nippon Mining & Metals Group's business operations, it is necessary for not only the Group but also our business partners' supply chains to fulfill their responsibility to society. Therefore, we also require our business partners to operate in accordance with the items below. Going forward, we will confirm the process of improvement with respect to business partners who violate the items below and receive an adverse disposition from the government, and business partners revealed not to be complying with the items below. Furthermore, in the case that a business partner is not complying with the items below, we will consider whether it is necessary to review (or cancel) the contract with the business partner.

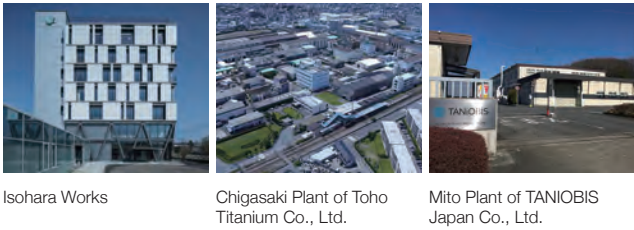
1. Comply with laws, regulations, and social norms, such as those below, and place priority on human rights and environmental impact. In the event of any inconsistencies between internationally-recognized human rights principles and the laws, regulations, social norms, etc., respect the international human rights principles.
 - Obey laws and regulations related to manufacturing and sales, etc.
 - Abide by laws and regulations related to safety and health and develop a proper labor environment
 - Prohibit discrimination based on race, gender, etc. and respect the human rights, personality, and individuality of employees
 - Prohibit bribery and other unfair conduct
 - Preclude all relations with "antisocial forces" (the term used to refer to organized crime groups in Japan)
 - Comply with labor-related laws and regulations
 - Prohibit child labor and forced labor
 - Comply with environmental laws and regulations
 - Do not engage in conflict minerals procurement or use that contributes to inhumane acts
2. Engage in sound and fair business management.
3. Based on the JX Nippon Mining & Metals Group's Green Purchasing Guideline, build environmental management systems and properly manage specified chemical substances.
4. Offer stable supply capacity and satisfy the quality, price, delivery, and service requirements of the JX Nippon Mining & Metals Group.
5. Possess technological capabilities that meet the requirements of the JX Nippon Mining & Metals Group.

Underwent VAP Audit by RBA*

In order to appropriately address increasing corporate social responsibility and demands from client companies, the Group is actively pursuing initiatives in line with international standards. In fiscal 2019, the RBA's Validated Audit Process (VAP) audit was conducted at the Chigasaki Plant of Toho Titanium Co., Ltd. and at the Mito Plant of TANIOBIS Japan Co., Ltd. It was also conducted at Isohara Works in fiscal 2020.

The RBA VAP audit is an assessment of maintenance and compliance with standards and management systems related to labor, safety, health, environment, and ethics, in accordance with the RBA Code of Conduct. This audit's assessment resulted in acquiring Platinum status, the highest in the RBA certification program, for Isohara Works and the Chigasaki Plant of Toho Titanium Co., Ltd. Going forward, we will explore expanding the number of sites subject to audits and, by undergoing audits and implementing PDCA (Plan-Do-Check-Act) cycles to continuously improve our performance, we will contribute to the realization of a sustainable society throughout the global supply chain.

* Responsible Business Alliance (RBA)
A business alliance created with the goal of realizing responsible behavior in the electronics industry supply chain. This organization establishes standards to ensure safe working environments, dignity and respect in worker treatment, and responsible business activities vis-a-vis the environment.



RBA-issued VAP audit certificates
(Left) Isohara Works, (Right) Chigasaki Plant of Toho Titanium Co., Ltd.

Began Procedures to Obtain Copper Mark* Certification

In March 2022, JX Metals Smelting Co., Ltd. began procedures to obtain Copper Mark certification for its Saganoseki Smelter & Refinery and Hitachi Works. Both sites play a role in producing raw materials used in our advanced materials, which are indispensable for the development of society. They are also promoting Green Hybrid Smelting that boasts an even higher ratio of recycled raw materials and introduction of CO₂-free electricity to reduce energy consumption and make effective use of resources. With the acquisition of Copper Mark certification, we will further promote initiatives related to responsible production at both sites.

* Copper Mark
A framework established by the International Copper Association (ICA) in 2019 to demonstrate the copper industry's contribution to responsible production and the SDGs created by the United Nations. Copper Mark certification is based on an independent, third-party assessment of compliance with environmental, human rights, community, and governance standards. Evaluations are conducted by an independent third-party organization, and after certification, an evaluation of the target's achievements is conducted every three years.

Confronting the Problem of Conflict Minerals

"Conflict minerals" is the general term for minerals that are mined (illegally, in most cases) in conflict-affected regions, providing a source of funds for local armed groups. The use of these minerals may lead to increasing human rights abuses and inhumane acts. In response to the international trend for stronger information disclosure and monitoring by stakeholders, industry organizations relevant to the Group (including the LBMA^{*1}, LPPM^{*2}, and RBA) have established monitoring programs for eliminating conflict minerals, and require each business operator to undergo investigations and external audits.

^{*1} London Bullion Market Association (LBMA)
An industry association composed of financial institutions and others that deal in gold and silver ingot. Inclusion on this association's Good Delivery List is viewed as a guarantee of high quality and reliability.
^{*2} London Platinum and Palladium Market (LPPM)
An industry association composed of financial institutions and others that deal in platinum and palladium ingot. Inclusion on this association's Good Delivery List is viewed as a guarantee of high quality and reliability.

Initiatives in the Gold, Silver, Platinum, and Palladium Supply Chains

JX Metal Smelting Co., Ltd., as a producer of gold, silver, platinum, and palladium ingots, has established and operates a management system for supply chain due diligence that calls confirmation of the origin of raw materials, risk assessments, and confirmation of distribution routes. Operational status is reported to the LBMA and LPPM after undergoing an external audit by a third-party organization designated by the association. As a result of these processes, the LBMA has included gold

ingots produced at the Saganoseki Smelter & Refinery of JX Metal Smelting Co., Ltd. and silver ingots produced at the Company's Hitachi Works on its Good Delivery List. At the same time, they have been included on the RMAP Conformant Smelters list for gold compiled by the RBA and GeSI* — recognition that they are taking proper measures to exclude conflict minerals.

* GeSI: Global e-Sustainability Initiative
A global trade association of information and communications businesses focused on achieving digital sustainability



LBMA and LPPM-issued external audit certificates

Initiatives for the Tantalum Supply Chain

TANIOBIS GmbH, a producer of tantalum powder, implements a strict program of purchasing checks based on international standards for procuring raw materials from conflict-affected and high-risk areas. For example, it purchases materials guaranteed by the ITSCI* to have no involvement in infringements of human rights, and it conducts supply chain due diligence. As a result of these efforts, TANIOBIS has been included in the RMAP Conformant Smelters list in recognition of its appropriate measures taken to exclude conflict minerals.

In addition, as of fiscal 2019, TANIOBIS began use of a supply chain due diligence system similar to the ITSCI, by means of the Better Sourcing Program (BSP) provided by the RCS Global Group, an international auditing organization for the raw materials supply chain.

* ITRI Tin Supply Chain Initiative (ITSCI)
An initiative by the International Tin Research Institute (ITRI), a global industry group for tin. Based on OECD Due Diligence Guidance, it works to enable due diligence from mines to smelters, and to encourage procurement from mines in conflict-affected areas that is free of involvement with local armed groups.

Initiatives for Local Residents

Development and operation of mines can have a particularly significant impact on the surrounding environment. It is therefore essential to pay due consideration to the human rights of local residents. SCM Minera Lumina Copper Chile, the operator of the Caserones Copper Mine, applies a basic three-point policy for supporting local communities: respect for the lifestyles of local residents, protection of the community and environment, and respect for applicable laws. In keeping with this policy, since the launch of this project in 2007, the operator has held briefings and engaged in dialogue with the Collas, indigenous people living in the area around the mine site, endeavoring to build trust. As in earlier years, we found no violations of the rights of local residents in fiscal 2021.



Briefing session for residents

White Logistics Activities

At the end of April 2020, we announced our participation in the *White Logistics* movement launched by the Japanese government. We are promoting activities to resolve various issues based on our voluntary declaration of support for this movement. For example, in contracts with logistics providers, we are promoting appropriate action for contract reviews, such as separating driving from ancillary work, studying and introducing fuel surcharges, and reaffirming compliance with labor-related laws and regulations and trucking business-related laws and regulations.

Activity Content in our Voluntary Declaration of Support

Activities	
1	Making suggestions and cooperating in logistics improvements
2	Separating driving from ancillary work
3	Studying modal shifts for CO ₂ reduction
4	Establishing fuel surcharge agreements
5	Incorporating legal compliance considerations when selecting contracting parties
6	Taking safety measures during loading and unloading
7	Cancelling/suspending service during abnormal weather, etc.

TOPICS

Reinforced Sulfuric Acid Transportation in Hokkaido

In August 2021, we acquired a 34% stake in Hokuho Unyu Co., Ltd. (Tomakomai City, Hokkaido), a liquid transportation company and wholly-owned subsidiary of Maruwn Corporation. Hokuho Unyu is responsible for the transportation of sulfuric acid handled by the JX Group in the Hokkaido region, and we intend to further strengthen our transportation infrastructure through this investment.
In the copper smelting process, our Group produces sulfuric acid from the sulfur contained in copper concentrates. Sulfuric acid is used in a wide range of fields, including industrial and agricultural applications.

Human Rights Education and Internal Awareness Raising

The Group provides and makes known guidelines on human rights issues including discrimination, harassment, forced labor, and child labor, for the prevention of these issues. We also create opportunities for periodic training to ensure retention of human rights awareness.

JX Nippon Mining & Metals Group Compliance Regulation (excerpt)

Prohibition of unjust discrimination

JX Nippon Mining & Metals Group companies and their officers and employees shall not discriminate in their business operations relating but not limited to hiring, salary, working hours, work conditions, and business terms due to reasons that include but are not limited to race, nationality, sex, age, religious belief, social status, or physical characteristics.

Prevention of harassment

JX Nippon Mining & Metals Group companies and their officers and employees shall work proactively to prevent sexual harassment (including gender harassment) and power harassment.

Protection of personal information

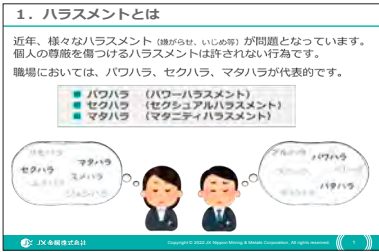
JX Nippon Mining & Metals Group companies and their officers and employees shall comply with personal information protection laws, regulations, and internal rules, adequately of parties including but not limited to customers, business partners, and employees, and in situations where personal information needs to be managed for business purposes, manage it with the utmost care.

Prevention of child labor and forced labor

JX Nippon Mining & Metals Group companies and their officers and employees shall not be involved with child labor or forced labor and shall work to help solve these issues.

Human Rights Education

We provided human rights training to all Group employees in fiscal 2021, themed on harassment prevention. This theme was established given the clear provisions in the JX Nippon Mining & Metals Group Compliance Regulation that we shall not engage in discrimination or harassment, to raise employee awareness of human rights and understanding of harassment. Based on the concept that “anyone can be a perpetrator or a victim of harassment,” the program provided a good opportunity for each participant to gain an awareness of how harassment affects both companies and employees, and to re-evaluate our own words and actions, as well as our work environment. We will continue our work to ensure an understanding of human rights concepts in our global business operations and to do business in consideration of human rights.



E-learning materials

Total Hours Spent in Human Rights E-Learning Training
(Number of trainees x course hours)

Fiscal 2021
1,691 hours

Human Rights Consultation and Remedies

The Group has established the JX Nippon Mining & Metals Group Hotline as an internal consultation service for human rights violations and other issues. Employees are able to anonymously use this hotline to discuss any issues related to human rights—from those that may crop up on a day-to-day basis to significant infringements. All reports to this hotline are presented to the president, including a report on our response to each. Information about the establishment of the hotline is posted on our intranet and disseminated through various training programs, including human rights training. No one using the hotline for consulting or reporting shall be subjected to disadvantageous treatment for its use. Eight reports were made to the hotline in fiscal 2021.

In regard to remedies, no restrictions have been made on resolving issues for consultation through external remedies, and therefore consulting parties may seek other remedies according to the legal system of the country in question.

Materiality 5
Coexistence and Co-Prosperity With Local Communities

Since the inception of our business at the Hitachi Mine, the JX Nippon Mining & Metals Group has emphasized the spirit of maintaining good relations with local communities in conducting its business. Keeping alive that spirit today, we have written coexistence and co-prosperity with society into our Code of Conduct. We additionally set an action plan for each fiscal year and work day to day to fulfill it.



KPIs and Progress

Assessment: 😊 Achieved/Steady Progress ☹️ Not Achieved

KPI	Fiscal 2021 Results/Progress	Assessment
Continuing dialogue with local communities	Despite the impact of COVID-19, we endeavored to understand the needs of local communities, building trust with stakeholders related to corporate activities through ongoing dialogue.	😊

Social Contribution Activities

With the goal of further strengthening relationships with local communities through social contribution activities, the JX Nippon Mining & Metals Group conducted community-based initiatives at each of our operating sites in Japan and overseas. While the impact of COVID-19 resulted in restrictions or limitations on our activities, we endeavored to create opportunities for communication with local communities, valuing the spirit of coexistence and co-prosperity that we have pursued since our founding.

Results of Main Social Contribution Activities in Fiscal 2021

	Activity	Location	Date	Description
Environmental Conservation Activities	Cleanup around plant areas	Various group locations	Year-round	Cleanup activities on roads and local river basins surrounding our plants
	Participated in cleanup activities around the Miyata River	Hitachi Works	June and October 2021	Participated in cleanup activities organized by a local resident-led association for cleaning up the Miyata River. A total of 320 people participated in two sessions
Educational Activities	Plant tours	Various group locations	Year-round	Organized plant tours for area students (elementary, junior high, and high school), explaining plant facilities and the nature of the work performed
	Internships	Various group locations	Year-round	Internships for industrial high school, technical college, and university students; practical training and presentations
	Held educational programs for the hearing impaired	SCM Minera Lumina Copper Chile	July 2021	Held an educational program for the hearing impaired living in the surrounding areas, helping them to obtain a driver's license
	Held the Rikochallenge (science and engineering challenge)	Kurami Works, Saganoseki Smelter & Refinery, JX Metals Smelting Co., Ltd.	August 2021	Held plant tours, experiments on the characteristics of copper, and interactions with science and engineering employees for junior high students (→ Page 69)