



TREVALI

Supplier Code of Conduct

Trevali Mining Corporation (Trevali) is committed to responsible business conduct. We anticipate that the suppliers with whom we do business operate to commensurate our governance, social and environmental standards and, respect our values.

Our Expectations

The Trevali Supplier Code of Conduct (“Supplier Code”) applies to all vendors and suppliers (suppliers).

We expect suppliers to follow and adhere to all applicable regulations and laws where they operate, as well as the minimum standards provided in this Supplier Code. The minimum standards described in this Supplier Code should be incorporated into Supplier’s own operation, regardless of the type of contract or the work location, including individuals working for the Supplier through a third-party contract.

Trevali expects suppliers to take appropriate actions to ensure that their own suppliers also comply with the minimum standards of this Supplier Code. All potential suppliers will be screened on the basis of their commitment to human rights (including labour rights and health and safety) and environmental performance, as part of the Trevali vendor pre-qualification commitments.

To ensure adherence to the Supplier Code, Trevali may seek to conduct due diligence on any supplier. This may take the form of requesting evidence of a recent audit completed or, if insufficient evidence is provided, a direct audit of the primary facility or facilities where the goods or services are manufactured or rendered.

In the case of non-compliance with the Supplier Code minimum standards, Trevali will work together with suppliers to put in place mutually agreed corrective actions within a reasonable timeframe. If the supplier is unwilling to correct the gaps found or is materially misaligned with the Trevali values, then Trevali may terminate the contract.

Our Values

We are committed to conducting business with integrity and fairness, ensuring we meet or exceed regulatory requirements and operating in alignment with our Code of Business Conduct.



Teamwork



Respect



Performance



Care

Sourcing Expectations

Our commitment to operate with sustainability embedded as part of how we operate implies that our suppliers support us in following our standards. For this reason, we want to develop collaborative and supportive relationships that raise the standards of sustainability performance across our supply chain.

Acknowledging, respecting, and adhering to the Supplier Code is a minimum requirement for our suppliers. By signing it, the Supplier agrees to meet the expectations outlined in the Trevali Code of Conduct and Ethics and the minimum standards outlined below for governance, human rights, health and safety, community, and the environment.

We encourage suppliers to contact us if they require further guidance, clarification, or support to ensure compliance with the Supplier Code. Suppliers can contact Trevali for guidance on how to apply the supplier code of conduct through their contract manager. Proactive training and guidance are provided to all suppliers to ensure that the intent and actions expected as written in this Supplier Code of Conduct are understood.



Where to go for help?

- Contract manager
- Trevali Procurement

ETHICS

Suppliers who act illegally or unethically can affect our financial performance and profitability, significantly impact our reputation and potentially expose Trevali and our employees to criminal or civil penalties. To avoid this, we work with suppliers who operate with commensurate Codes of Conduct.

Integrity and Fairness

We expect that suppliers conduct business with integrity, fairness, and in compliance with applicable laws and legislations. Suppliers must comply with all applicable laws relating to the prevention of money laundering, combating of terrorism and trade laws.

Market Competition

Suppliers should stand for open, fair, and competitive business environment. We expect that suppliers do not engage in price fixing, business espionage, or other unfair, anti-competitive trade practices.

Bribery

Trevali does not accept any form of bribery, in any location, at any time. Suppliers should not accept, ask for, engage in, make, offer, promise, or authorize any bribes, which can be any form of facilitation, anything of value, including even small payments, non-monetary gifts, or favours. The Supplier will not engage in or facilitate any form of money laundering, corruption, or fraud.

Conflict of Interest

Trevali manages its business very seriously and avoids conflicts of interest. Any situation where it is possible to perceive a potential conflict of interest, the supplier should immediately disclose this to Trevali so that appropriate action can be taken to mitigate risks. Suppliers should be aware of the risk of association with “politically exposed persons” (PEP) and declare these in all dealings with Trevali.

A politically exposed person is one who has been entrusted with a prominent public function. A PEP generally presents a higher risk for potential involvement in bribery and corruption by virtue of their position and the influence that they may hold.

Dealing with Information

Trevali expects that all suppliers are committed to the accuracy of the information they provide, are clear and transparent with information and keep records in compliance with local legislation. The supplier should not disclose any information that it possesses regarding Trevali to third parties, neither to engage in or support insider dealing. Appropriate levels of cyber-security should be in place to protect Trevali information.

RESPECTING HUMAN RIGHTS AND DIGNITY

Trevali is committed to respecting human rights globally. We value and support the dignity and human rights of all people and we expect the same commitment from our suppliers. Suppliers should have a whistleblower channel in place, with clear communication that there is no retribution for speaking-up.

Anti-Discrimination

We expect the supplier to treat people equally and fairly, based on the principles of non-discrimination. The supplier should foster a culture on inclusivity by respecting cultural and individual diversity.

We anticipate that the supplier employs, rewards, and promotes based on the principle of equal opportunity, without distinction, according to race, ethnicity, caste, gender, sexual orientation, religion, nationality, social origin, age, political affiliation, disability or any other diversity characteristics. This means that the supplier makes employment decisions including hiring, placement, promotion, development, training, and compensation based on the persons qualifications, experience, performance, skills, and potential.

Anti-Harassment and Abuse

The suppliers workplace should aim to be free of harassment and abuse, with zero tolerance for physical, verbal, sexual or psychological harassment, bullying, abuse, or threats.

Freedom of Movement and Prevention of Forced Labour and Trafficking

All employees, including contract workers, should work at their own will. Supplier will not be involved in human trafficking or use any form of slave, forced, bonded, indentured, or prison labour.

None of the employees, including contract workers, should be required to pay any fees to obtain or retain their employment. Fees and costs associated with recruitment and employment should be paid by the supplier. Suppliers should not withhold employees' original government-issued identification and travel documents. Suppliers will ensure that their employees' contracts are clear, in a language understood by them and that they are aware of the terms and conditions of their work. Suppliers will not impose unreasonable restrictions on movement within the workplace.

Prevention of Underage Labour

Suppliers must respect the rights of the child as stated in the Convention on the Rights of the Child, and will not engage in, or allow, child labour within their facilities or in those of their suppliers. Suppliers should follow the International Labour Organization (ILO) definition of the minimum age for admission to employment or work. This age will not be lower than the age of completion of compulsory schooling and, in any case, should not be under 15 years of age, except in some countries where it may vary based on local legislation. The supplier should comply with local law if that sets an older age to define child labour.

Working Hours

The supplier should always comply with the local laws and regulations with respect to working hours, overtime, and days of rest. Suppliers should provide enough rest and leisure and take measures to prevent employees from working excessive hours.

In the absence of local laws or collective agreements, a workweek should be restricted to 60 hours, including overtime, and at least one day off every seven days except in emergencies or unusual situations. Working hours, inclusive of overtime, shall not exceed 12 hours in any 24 hour period.

Wages and Benefits

The supplier will pay its employees at least the minimum wage for work performed, respecting the statutory minimum wage set in the country in which it operates. Where the statutory minimum wage is non-existent or not sufficient to meet basic living needs, the supplier should pay employees enough to ensure a decent living standard. This wage should satisfy basic food, shelter and medical needs for employees and their families.

Suppliers will provide any benefits required by law and/or contract with employees. Suppliers will meet all legal requirements relating to wages and benefits, paying accurately and in timely manner. All use of temporary and outsourced labor will be within the limits of the local law.

Freedom of Association and Collective Bargaining

Trevali's Code of Conduct indicates the Company's commitment for employees to participate in freedom of association and collective bargaining, without interference, discrimination, retaliation, or harassment. We expect suppliers to respect the same workers' rights and to ensure there is zero retribution against any employee who exercises these rights.

COMMUNITIES AND INDIGENOUS PEOPLES

Trevali respects, values, and cares about the communities that we operate in. We believe in developing lasting mutual benefits and we are guided by the principle of self-determination. We respect Indigenous people's rights and aim to achieve Free, Prior and Informed Consent.

Where possible, suppliers should seek to enrich local communities and teach skills that enable people to prosper beyond the life of mine or contract. To foster economic inclusion, we expect suppliers to have a policy of building skills and employing local community members, including and especially those who are under-represented.

Suppliers operating near or in a Trevali community, must notify Trevali of any commitments made regarding employment, procurement or skills building. Suppliers should be aware of how their service, product, or activities may impact, positively or negatively, communities. We expect suppliers to respect and comply with indigenous peoples and First Nations agreements.

The supplier should maintain a respectful dialogue and recognize local culture, heritage, and traditions. Grievance and complaints mechanisms for external parties must be made available by suppliers to the communities they interact with.

HEALTH AND SAFETY

We will only be successful when every worker goes home safe and well every day and lives a life free from illness. Trevali is committed to achieving leading industry practice in health and safety and we aim for zero workplace injuries. In all cases, we aim to meet or exceed legal requirements.

Suppliers should measure and report incident or illness rates and use these, and a risk management system, as a basis for improving performance.

All accommodation provided must comply with legal requirements, be clean, safe and meet the basic needs of the workforce.

Working Safely

We expect the supplier to provide a safe and healthy working environment for its employees, including providing safe tools, equipment, and vehicles that are suitable for the work that is undertaken. Suppliers should ensure that employees are trained and able to operate tools, equipment, and vehicles safely.

Appropriate personal protective equipment must be available for the type of operation performed and available at no cost to the employee. Suppliers and their employees must adhere to applicable safety and health procedures and work instructions when working for at our operations or remotely.

Emergency Preparedness and Response

Supplier should identify and assess potential emergencies at the workplace. In each situation, suppliers should develop and implement emergency plans and response procedures to mitigate harm to life, environment and property. Supplier employees should have access to emergency medical facilities.

Health and Safety Communication

Employees should have the right to refuse unsafe work and to report unhealthy working conditions, without fear of reprisal. Health and safety-related information should be easily accessible in the supplier's workplace. Suppliers are expected to maintain all safety and health related documentation, including permits, license and other records as required by law. Site-based contractors shall ensure that all materials and chemicals brought onto site will have up to date Material Safety Data Sheets and be in original labelled containers, or clearly marked with handling, use and disposal instructions.

ENVIRONMENT

Trevali aims to have a net-positive impact wherever we operate. This means mitigating our negative impacts and seeking to compensate or enhance our positive impacts. Suppliers shall monitor their environmental impact and assess and manage environmental risks. Suppliers must be aware of the environmental impacts caused by their services or products and implement measures to minimize the impact and keep the accepted levels under control.

We expect suppliers to adhere to applicable local laws concerning their products and services, energy, water, hazardous materials and waste management. We expect suppliers who harm biodiversity to offset their impact.

REPORTING CONCERNS

Trevali values and encourages its suppliers, employees, communities, and any other stakeholder to speak up if they have concerns regarding a possible violation of our Code of Conduct and policies, including this Supplier Code.

Speaking up is an opportunity for us to identify and repair potential misconduct. Suppliers can report their concerns by filing a report online through Clearview Connects, and have the choice to do this anonymously. →



Speak up and be heard

- <https://www.clearviewconnects.com/home>
- Phone: +1-866-889-5196
- Mail to: P.O. Box 11017, Toronto, Canada, M1E 1N0

For further information, clarification, and support related to the Trevali Supplier Code, please contact your Trevali contact person or submit a general request via www.trevali.com



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