

2021

Modern Slavery Statement

Jervois

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Introduction

This Modern Slavery Statement (this “**Statement**”) is made by Jervois Global (“**Jervois**” or the “**Group**”) to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) for the reporting period commencing 1 January through 31 December 2021.

As part of Jervois’ responsibility to respect human rights in our operations and supply chains risks in accordance with the *United Nations Guiding Principles on Business and Human Rights*, we recognize the need to take concrete steps to assess and address modern slavery risks.

This Statement concerns the steps that Jervois and its subsidiaries have taken during the relevant reporting period to identify and address modern slavery risks within our supply chain and outlines the measures that we will take over the course of subsequent reporting periods to improve our practices to combat modern slavery.

This is Jervois’ first Modern Slavery Statement under the Australian Modern Slavery Act. This Statement was approved on 11 March 2022 by the Board of Directors on behalf of all reporting entities and subsidiaries in the Group and is signed by the Chairman of the Board of Jervois Global (page 16).

This Statement has not been externally assured but has been drafted through an internal consultation, review and validation process. We welcome feedback at compliance@jervoisglobal.com.

We publicise our values with respect to Modern Slavery to those outside of Jervois by publishing this Modern Slavery Statement, alongside other related policies and reports, on our website at www.jervoisglobal.com. We additionally have lodged this Statement with the Australian Government’s Online Register for Modern Slavery Statements at <https://modernslaveryregister.gov.au>.



Our Business



Our Business

Jervois Global is a multinational battery and specialty chemicals operating company with a strategic focus on nickel and cobalt. Currently, we produce specialty cobalt powders and chemicals at our plant in Finland, are on-track to begin producing cobalt, copper and gold concentrates at our mine in the United States in 2022 and feasibility studies are underway at the nickel-cobalt refinery in Brazil we have contracted to purchase.

As of December 31, 2021, Jervois employed 244 full-time equivalent permanent staff (FTE) worldwide. This figure is increasing each week as new hires are brought into sites currently under restart or expansion, namely in the United States and Brazil.

We are a public company listed on the Australian Stock Exchange (ASX: JRV) and Toronto Venture Exchange

(TSX-V: JRV) and traded on OTQX in the United States (OTCQX: JRVMF). Our headquarters are located in Melbourne, Australia.

Jervois is firmly committed to the principles of responsible mining and refining, including through ethical business conduct and by forging meaningful, valued relationships with communities, governments, investors, suppliers, customers and other stakeholders. Jervois is an active member of the Cobalt Institute (“CI”), the Zero Emission Transportation Association (“ZETA”), among others. Jervois Finland (“JFO”) is the first cobalt chemical and metal powder producer to be found conformant to Responsible Mineral Initiative’s (“RMI”) Downstream Assessment Program (“DAP”).

For more information, please see our 2021 Annual Report and visit our website: www.jervoisglobal.com.

Specialty Cobalt
chemicals
producer at
Jervois Finland



Cobalt, copper and gold
exposure with Idaho
Cobalt Operations (“ICO”),
on track to become the
only primary cobalt mine
in the United States



Nickel and cobalt refinery
and direct downstream
customer exposure by the
upcoming acquisition of the
São Miguel Paulista (“SMP”) nickel cobalt refinery in São Paulo, Brazil



Our Organizational Structure

The Group entered the financial period with a portfolio of assets: the Idaho Cobalt Operations (“ICO”) in Idaho, United States, which is due to commence production in 2022; Jervois also continued its acquisition of the São Miguel Paulista nickel and cobalt refinery in Brazil from Companhia Brasileira de Alumínio (“CBA”). During the period, it announced the acquisition of Freeport Cobalt, a leading cobalt chemical and powder producer in Kokkola, Finland, which it completed on 1 September 2021. In addition, Jervois owns 100% of the Nico Young nickel-cobalt project in New South Wales, Australia, which is currently in pre-development stage.

Jervois operates as a combined group. By the end of the period, the Group’s material controlled entities included Jervois Global Limited (registered in Australia), Jervois Switzerland SA (registered in Switzerland), Jervois Suomi Holding Ltd. (registered in Finland), Jervois Mining USA Limited (registered in the United States) and Jervois Brasil Participacoes Limited (registered in Brazil).

Our Supply Chain

Across its operations, Jervois utilizes a network of approximately 1,140 direct suppliers for the provision of products and services required to support our activities and operations.

This includes consulting services and manpower, construction and mining services, construction materials, reagents, chemicals and gases, fuel, transportation services and companies engaged in the manufacture, delivery, installation and maintenance of mining, mineral processing and refining equipment. Our suppliers also include telecom companies, electricity providers, financial services, insurance providers, property agents, suppliers of our PPE,

uniforms and apparel, security providers, and companies that meet our administrative requirements, among others.

We aim to support local economic development by procuring local products and services from communities where we operate wherever possible. Given the different phases of development and operations at our sites and the specialized nature of many requirements, our suppliers comprise both multinational entities and local suppliers. In 2021, our Top 10 suppliers (by spend) constituted approximately 80% of our total procurement spend and were based in Switzerland, Finland and the United States.

Given the various stages of our projects, only Jervois Finland (“JFO”) was in production in 2021. In the reporting period, JFO sourced its cobalt feed from European and Asian companies engaged in battery, hardmetal, and catalyst recycling, and a limited number of Western operated and or constructed large scale industrial mining operations located in the Democratic Republic of Congo (“DRC”).

JFO does not source cobalt feed from artisanal miners and our procurement process relies strictly on the *OECD Due Diligence Guidance on Responsible Mineral Supply Chains* and is subjected to 3rd party assurance in line with the Responsible Minerals Initiative (“RMI”)’s Downstream Assessment Program (“DAP”).

Our customers include approximately 200 companies engaged in production of batteries, chemicals, catalysts, ceramics, and powder metallurgy, predominately from Europe, the United States and Japan. End use market applications include batteries, hard metals, diamond tools, powder metallurgy, pigments, glass and ceramics, catalysts, electronics, animal feed production and carboxylates. The majority of these customers have had relationships with the JFO operations for over 10 years with some exceeding 20 years.



Risk Assessment, Management & Mitigation



Risk Assessment, Management & Mitigation

The Australian Modern Slavery Act defines modern slavery to include slavery, servitude, forced labour, debt bondage, forced marriage, trafficking in persons, deceptive recruiting for labour or services and the worst forms of child labour. Tactics of offenders may include coercion, threats, or deception to exploit victims and undermine their freedom¹.

Jervois believes there is no place for modern slavery under any circumstance. We recognize our responsibility to take action to assess and address modern slavery risks in our supply chain and evaluate the effectiveness of these actions.

As this is Jervois' first Modern Slavery Statement, we acknowledge that much work remains to be done to ensure that our actions (alongside those to address other human rights risks), become formalized within a broader Supply Chain Risk Management Framework and they effectively achieve their aims.

Given that our operations are at various stages of development – production at our Finland operations, construction of our mine in Idaho, United States, and in feasibility study phase for SMP refinery in Brazil we have contracted to buy – an ongoing priority continues to be ensuring that our practices are harmonized across the organization.

Modern Slavery Risks

The risks of modern slavery vary within our business; among our suppliers and customers, and within different countries where we operate, source and supply products. Modern slavery risks that Jervois may directly or indirectly be linked with are outlined below, followed by a preliminary assessment of these risks and limitations to our assessment.

Risks in our business

Jervois has active operations and projects across 4 countries, namely Finland, the United States, Brazil and

Australia, and corporate and or sales / marketing offices in Australia, Switzerland, the United States, Japan, Germany and China. According to the Global Slavery Index², increased modern slavery risks by virtue of location are associated with Brazil, where Jervois is undertaking Feasibility Studies at Sao Miguel Paulista Refinery, and China, where we have a minor commercial office.

Within Jervois' operations and offices, our established labour policies and human resource systems demonstrate high levels of compliance with labour laws, are well-aligned with the Group's core values and provide strict controls, including with respect to recruiting, hiring, and contracting workers, the scope of their contracts, working conditions and opportunities for redress.

Despite this, numerous 3rd party assessments and media reports have determined that, even within the most advanced nations, various forms of modern slavery can occur³. Cited cases within developed countries include domestic servitude, forced labour, debt bondage and various forms of human trafficking (including for sex and other forms of forced labour), among others. Migrant labourers are believed to be particularly vulnerable to deceptive recruitment and subjected to, for example, debt bondage, where identification documents and/or portions of pay may be withheld until "debts" are paid (e.g. for transportation and accommodation costs or recruitment fees). Risks may be higher in low-skilled sectors, such as construction, garment production, domestic work and cleaning services. These risks are gendered, with women and girls more likely to be exploited in domestic work and sex work, and men and boys at greater risk in construction, manufacturing, and agriculture⁴. Within any community, poverty and economic inequality can be core factors affecting the susceptibility of individuals and groups to modern slavery.

Jervois acknowledges that we may directly or indirectly be linked with certain modern slavery risks in our business and have considered such risks in our identification of "high risk categories", described further below.

¹ <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>

² <https://www.globalslaveryindex.org>

³ <https://www.walkfree.org/reports/murky-waters/> ; [https://www.theguardian.com/world/2018/jul/19/us-modern-](https://www.theguardian.com/world/2018/jul/19/us-modern-slavery-report-global-slavery-index)

[slavery-report-global-slavery-index;](https://www.thenewfederalist.eu/the-reality-of-modern-slavery-in-europe) <https://www.thenewfederalist.eu/the-reality-of-modern-slavery-in-europe>

⁴ <https://plan-uk.org/blogs/global-estimates-of-modern-slavery-we-need-to-talk-about-gender>

Other risks within our immediate operations and offices considered by Jervois are believed to be relatively low by virtue of jurisdiction, controls in place and phase of activities in each location.

For example, we recognize that risks may exist related to the possible behaviours of employees, consultants and contractors in their respective home communities and/or in communities around our areas of operation, for example related to sex work or domestic work. Near future considerations relate to worker's rights where movements to surrounding communities may be restricted outside of working hours. In 2022, camp construction at ICO in the United States will be finalized. Standard rotational contracts, rules and safety and security protocols that may affect movements will be fully in-line with labour and related legislation and international standards.

Although considered to be relatively low risk, these and other issues are nevertheless on Jervois radar and included within current or planned prevention and mitigation measures as outlined in subsequent sections of this Statement.

Risks related to our suppliers and customers

Jervois sources from over 1,100 Tier 1 suppliers from approximately 25 countries and sells to approximately 200 Tier 1 customers in over 40 countries globally.

Beyond our direct supply chain, we recognize that we could indirectly be contributing to modern slavery via the multiple tiers of our Tier 1 supplier and customer supply chains. Risks may be particularly high in association with outsourcing of manufacturing or sourcing of services, materials, and inputs from a complex network of independent entities from fragile states with poorly regulated labour standards and relatively high levels of poverty.

We recognize that an area for future improvement is gaining visibility beyond Tier 1 supply chains and prioritizing next steps in leveraging our influence. While we have aimed to increase our understanding beyond Tier 1, our starting point is mapping our supply chain risks for our larger Tier 1 suppliers engaged in high-risk categories and on whom we can exert greater influence.

Modern slavery risks associated with our Tier 1 suppliers and customers are categorized as follows:

Geographic Risk:

Weak governance, corruption, poverty, conflict, migration, and gender inequality, among other factors, are often associated with higher modern slavery risks. Countries with state-imposed forced labour are clear red flags. Government response and legislation in certain jurisdictions (e.g. EU, Australia) can increase confidence but does not eliminate modern slavery risks.

Industry, Sector and Product Risk:

Certain industries, sectors and products have been identified as higher risk for modern slavery. This includes those that: have high demand for imported equipment, raw materials and other inputs (e.g. mining and other industries); rely on low-cost, base-skilled or vulnerable people, including migrant populations (e.g. domestic work, construction, logistics and transport, textiles); or sectors with business models that heavily rely on third-party arrangements (e.g. mining, construction).

Entity Risk:

Organizational transparency and commitments to good ESG practices are useful factors when ascertaining modern slavery risks associated with different entities. Ownership and history of labour and other human rights violations are important indicators.

While public companies can be much easier to assess than private and state-owned enterprises, due diligence on ownership, policies, and performance, including with respect to labour and supply chain standards, is warranted in all cases.

Limitations

Particularly beyond our Tier 1 suppliers and customers, we have limited visibility on the multiple tiers comprising the broader supply chain. This is compounded by inadequate availability and reliability of data, particularly within specific industries and countries. Influencing our Tier 1 suppliers to map their own supply chains risks and exert similar influence on their own suppliers would mark an important step.

Jervois additionally recognizes the need to formalize modern slavery and other human rights risk assessment tools within its suite of policies, procedures, and practices. This 2021 Statement provides a foundation for progress in this direction.

High Risk Categories

Jervois may be directly or indirectly linked with modern slavery, including under the following high-risk categories.

Mineral Raw Materials and Mineral Products	<p>Modern slavery risks in mineral supply chains primarily relate to labour practices, transport, logistics, material inputs, ownership and governance, among others. Child labour and working conditions in artisanal mining, particularly related to cobalt production from the DRC, is of great concern.</p> <p>In 2021, all of JFO's cobalt feed suppliers from the DRC were large-scale, industrial mines. The remaining suppliers were European and Asian companies engaged in battery, hardmetal, and catalyst recycling. Jervois strictly does not source from artisanal miners.</p> <p>Modern slavery and other human rights risks associated with mineral sourcing are of paramount importance to Jervois. Our comprehensive due diligence procedures are aligned with <i>OECD Due Diligence Guidance on Responsible Mineral Supply Chains</i> and assured via 3rd party audits in conjunction with the Responsible Mineral Initiative's ("RMI") Downstream Assessment Program ("DAP").</p>
Equipment Fabrication	<p>In 2021, we sourced or initiated fabrication of large, specialized items of equipment for use in mining and mineral processing. While suppliers of this equipment are mainly from the EU and US, beyond Tier 1, we recognize that production of some components and raw materials may take place in jurisdictions where labour standards and working conditions may be inconsistent with our policies and standards.</p>
Reagents, Chemicals and other Gases	<p>In 2021, we sourced our process chemicals, reagents and gases used in refining from suppliers in Finland, and other EU countries as well as China, India and elsewhere. Most of the raw materials used for their production are believed to mainly originate in those countries but some exceptions are likely to exist. Although this industry is fairly-well regulated, risks associated with jurisdiction and related to suppliers sourcing raw materials, equipment or other inputs from high-risk countries cannot be excluded.</p>
Construction	<p>The construction sector commonly subcontracts low-skilled, low-cost labour, increasing risks of deceptive recruitment practices, bonded labour and related forms of exploitation. It can also source materials, equipment and other inputs from high-risk jurisdictions where a range of modern slavery risks may exist. Jervois' only construction in 2021 was carried out at our mine in the United States (ICO) where country risks are comparatively low. Inclusion of requirements to comply with our Code of Ethics and Business Conduct in contracts coupled with ongoing engagement between leadership and our contractors helps reduce risks. Particularly prior to initiating construction in higher risk jurisdictions (e.g., Brazil), we recognize that stricter supplier due diligence, onboarding and other controls are warranted.</p>
Transportation and Logistics	<p>Particularly outside of countries where we operate, Jervois has little visibility on modern slavery risks associated with freight and warehousing in our supply chains. We recognize that within the United States and Finland, where our activities are most intensive, risks related to road, rail and warehousing need further scrutiny. Internationally, the shipping industry has been linked with various forms of exploitation ranging from poor pay and working conditions to withholding pay to inadequate forms of redress for workers. Challenges in due diligence are compounded by inadequate regulatory oversight.</p>
Uniforms and PPE	<p>The Global Slavery Index, 2018, cites the garment industry as posing one of the highest risks for modern slavery. Internationally, low-cost fabrication of uniforms, apparel and various types of PPE often takes place in jurisdictions with poor labour practices, inadequate regulatory oversight, and deficient grievance mechanisms. While our Tier 1 suppliers may be situated in lower-risk jurisdictions, we recognize that we may be directly or indirectly linked to these risks through sourcing of these goods.</p>
Electronics and Electrical	<p>Similar to the garment industry, electronics such as laptops, computers and mobile phones, are ranked as one of the highest risk industries, where both manufacturing and production of raw material inputs can put workers at risk. While our Tier 1 suppliers may be situated in lower-risk jurisdictions, Jervois may be directly or indirectly linked to these modern slavery risks through sourcing of these and other electrical components (e.g. cables, batteries, transformers).</p>
Temporary Labour and Short-Term Contracts	<p>Temporary labourers, including those used in short term activities, cleaning services or various odd jobs in our and our Tier 1 supplier's operations, may be at risk of modern slavery, particularly if subcontracted through a 3rd party. Within our operations, contracting procedures are quite robust, and no concerns or complaints were received via our whistleblower and grievance mechanisms in 2021. However, in 2022, we will work to ensure our hiring arrangements for temporary workers are harmonized across operations while expanding our due diligence and controls on our suppliers of subcontracted labour.</p>

Due Diligence and Remediation Processes

Jervois is undertaking multiple efforts to improve our ESG performance and embed our commitments to human rights, including by countering modern slavery, throughout our organisation and supply chains.

Within our immediate operations, modern slavery risks are considered to be relatively low, thus our risk management response is tailored accordingly. We are nevertheless committed to progressively expanding our efforts and improving our outcomes including as new modern slavery risks are identified and as we strengthen our capacity to leverage our influence beyond our Tier 1 supply chains.

The foundation for these improvements is our current policies, standards and practices that support action against modern slavery and other human rights risks in which we may be involved.

Policies, Codes and Standards

Jervois commitments to good governance, sustainability and human rights are underpinned by our policies, codes, and standards, available on our website: www.jervoisglobal.com. These include, but are not limited to, the following which are particularly critical in informing our human rights response, including with respect to modern slavery.

Code of Ethics and Business Conduct:

The Code, together with our related policies, is the cornerstone of our commitment to conduct our business with honesty and integrity and in compliance with all applicable laws.

The code sets out the standards for conduct that we expect of our employees and all those with whom we have a business relationship. Our contractors, consultants and other suppliers are contractually required to comply with our Code of Ethics and Business Conduct.

Human Rights Policy:

Our human rights policy outlines our core commitments and responsibilities as needed to develop an organizational culture which proactively supports internationally recognized human rights and seeks to avoid complicity in human rights abuses, including those related to modern slavery.

Our Policy applies to the Company's Board as a whole, to all directors and Employees individually and to all others with

whom we have a direct business relationship, including partners, contractors, consultants, and other suppliers in what they do on our behalf.

Whistleblower Policy:

The purpose of this policy is to provide an avenue for reports to be made regarding corporate misconduct, irregularities or any other behaviour which is unethical, corrupt or illegal relating to the Jervois Group. These potentially includes those concerning human rights abuses, including modern slavery. The policy outlines the process for reporting and the protections and support available to individuals reporting, including anonymity, under the Corporations Act 2001 (Cth).

Cobalt Supply Chain Policy:

Given that the cobalt sector, as well as the mineral sector in general, are considered high-risk for instances of modern slavery, our suite of policies, standards and procedures includes specific measures to address human rights, modern slavery and other risks within our supply chain.

Framed on the requirements of the OECD Due Diligence Guidance, Jervois Finland (JFO)'s Cobalt Supply Chain Policy outlines our commitments to OECD's 5-step process and our expectations for supplier compliance.

Supplier Standard:

Our Supplier Standard further outlines our expectations of our contractors, consultants, and other suppliers with respect to ethical business conduct, human rights (including those concerning child labour, forced labour and other forms of modern slavery), health and safety and environmental responsibility. Additional requirements are outlined for suppliers of mineral raw materials and product including in accordance with OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Jervois' ESG and Compliance Committee, and designated members of the senior management team, primarily monitor compliance and performance with respect to our human rights related policies and standards. This is in close collaboration with the functions that support implementation within our operations and projects. Related systems and procedures are well-established at JFO and progressively being formalized within ICO and SMP as the latter move towards production.

Due Diligence

Given specific risks and concerns with mineral supply chains, Jervois Finland has a comprehensive due diligence framework in place in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. Our operation in Finland is the first cobalt chemical and powder producer to be found conformant to the RMI DAP.

The 5-step framework requires us to (i) Establish strong company management systems; (ii) Identify and assess risk in the supply chain; (iii) design and implement a strategy to respond to identified risks; (iv) Carry out independent third-party audits of the supply chain at identified points; and (v) Report on supply chain due diligence.

To learn more and access our related policies, public due diligence report and related information, please visit <https://jervoisfinland.com/sustainability/>.

As our operations in Idaho and Brazil move towards production, Jervois is strengthening coordination between our mineral supply chain experts in Finland and those performing key functions at these other operations with the intent of supporting compliance with the OECD guidance as they move into production.

For non-mineral supply chains, screening of our suppliers and vendor onboarding is common practice, aspects of which are described in subsequent sections. Alongside this, Jervois has initiated efforts to expand the scope of our current Know-Your-Supplier and Know-Your-Customer process including through self-assessment questionnaires for existing and prospective suppliers and related due diligence process in-line with the *UN Guiding Principles on Business and Human Rights*.

Our approach to due diligence and remediation is further reinforced by other actions and practices outlined below.

Supplier Engagement

In addition to inclusion of our Code of Ethics and Business Conduct in contractual obligations and further requirements under our Supplier Standard, we engage our contractors during our vendor onboarding process and on a one-on-one basis, including on core aspects of our Code of Ethics and Business Conduct.

Finland and the United States both have quite robust regulatory frameworks and relatively low incidence of modern slavery. In Finland, most of our suppliers have long-standing relationships with JFO and are similarly obligated

to meet strict EU requirements. In the United States, although the construction phase poses specific risks, our leadership at local levels actively engages with and oversees our on-site contractors daily to ensure responsible practices. Although the primary emphasis at ICO is on OHS and environmental protection, this deliberate, contractor-centered approach has been particularly effective at strengthening collaboration with contractors, ensuring they recognize their role in risk management and providing avenues for open communications, thereby laying the foundation for examination of a broader range of risks.

In 2022, Jervois aims to implement even more robust due diligence on existing direct suppliers of goods and services, particularly those linked with high-risk categories. Our direct engagement with suppliers will aim to reinforce other actions described herein to systematically identify any known or suspected modern slavery breaches in their business and supply chains; to better understand current actions being taken with respect to these risks; and to improve supplier awareness and leverage our commercial influence to affect change.

Training and Awareness

Our ability to effectively identify and address any instances of modern slavery within our business and supply chains relies first and foremost on the capacity of our employees, contractors, and other suppliers to identify and understand its signs. Supplier engagement is critical to raising awareness, yet we recognized that more focused efforts are needed to build capacity further.

Our operations systematically conduct induction training and onboarding of contractors tailored to identified risks and priorities in a jurisdiction and site and in response to incidents as they occur. JFO has a well-developed training program, inclusive of annual refresher training that covers a range of issues, including those related to ethical conduct and human rights issues. Training at ICO currently focuses on highest priority risks but will expand its current program in the same direction as it moves towards production.

Collaboration with Industry Peers

Among its memberships, Jervois is an active member of the Cobalt Institute ("CI"), with representation on its Executive Committee and within the Responsible Sourcing and Sustainability Committee ("RESSCOM") as well as chair of the Cobalt REACH Consortium.

In 2021, CI substantially increased its emphasis on human rights issues and the importance of embedding the *UN*

Guiding Principles on Business and Human Rights within industry practice. A number of 2021 RESSCOM meetings focused on analysis and understanding of human rights risks in the industry, including as a precursor to designing related training for member organizations in 2022. Jervois will ensure its leadership and management team as well as those engaged in related functions at operations levels (e.g. procurement, human resources, environment, community) benefit from this training, including as it reinforces planned expansion of our current training scope.

Whistleblower Process and Grievance Mechanisms

Providing mechanisms for our employees, suppliers, community stakeholders and others to report concerns, complaints or known or suspected incidences of misconduct plays a critical role in helping us to identify and address modern slavery and other human rights risks in our business and supply chains.

Jervois provides for this through the following:

- *Whistleblower Mechanism:* Our groupwide whistleblower mechanism enables reporting of potential misconduct to management. The process outlines requirements for receiving, investigating, and responding to reports in accordance with the stated protections for whistleblowers. Reports can be lodged anonymously and, as an alternative to legal counsel, to any Director, Secretary, senior manager, or external auditor. More details can be found at www.jervoisglobal.com/company/corporate-governance/.
- *Responsible Minerals Initiative (RMI) Online Grievance Mechanism:* In-line with our commitment to responsible mineral sourcing, Jervois Finland and RMI welcomes the submission of grievances as part of our continuous improvement and risk management program. A link to the online mechanism can be found at: www.jervoisfinland.com/sustainability/.
- *Operations-level Internal and External Grievance Mechanisms.* Separate mechanisms for (i) employees and suppliers; and (ii) community and other stakeholders are in place at JFO and ICO. Procedures outline the process, protections and responsibilities for reporting, investigation and response/remediation while providing for anonymity and supporting timely mitigation.

In 2021, zero reports of human rights-related misconduct were reported via the above mechanisms.

Jervois' Supplier Standard requires our suppliers to ensure a procedure is in place to enable employees and/or subcontractors or other workers to freely bring issues, concerns, or complaints to the Supplier's management without fear of intimidation, retaliations, or reprisal, including any issues related to implementation of the Standard. Contractors, subcontractors, and other workers are similarly encouraged to utilize Jervois' grievance mechanism to report concerns or complaints.

Incident Management

Integration of social, labour and human rights issues within our incident reporting, investigation, diagnoses, resolution and closure procedures reinforces our ability to identify, remediate and strengthen measures to prevent and address modern slavery risks.

JFO in Finland has a mature, well-functioning incident management system in place that spans a broad range of issues, including those related to community and labour issues. ICO in the United States is similarly diligent in managing a diverse range of incidents yet few social and labour incidents have been reported thus far. All incidents are reported to senior management and Jervois' ESG and Compliance Committee.

Jervois recognizes that issues that may not strictly fall under categories of social or human rights incidents can also have human rights implications. We will revisit our human rights classifications accordingly and build required capacity to expand our analysis of future health, safety, environment, labour, community, or security incidents through a human rights lens as will.

Supply Chain Audits, Corrective Action Plans and Remedy

Jervois' Supplier Standard provides for direct or third-party auditing of its implementation by our suppliers and reserves the right to require corrective actions and/or to take disciplinary action, including on issues concerning child labour, forced labour and other forms of modern slavery as well as other labour rights and working condition issues, among others.

Although impeded in 2021 by the Covid-19 pandemic, several direct and 3rd party site-based supplier audits of our mineral raw materials supplier have been carried out by JFO in accordance with standards outlined in the *OECD Due Diligence Guidance* and RMI requirements.

If an incident or suspicion of modern slavery arises in our business or supply chain, the process would mirror that employed during incident management, but with recognition that such occurrences require sensitivity to

victims and an approach tailored to each situation. Direct collaboration with our suppliers is important throughout the process to reinforce their role in openly reporting risks or incidents as they arise and support implementation of corrective actions. Collaboration with others may in some cases also be warranted, such as with government authorities, trade unions, non-governmental organizations (“NGOs”), or other bodies to ensure victims’ access to justice, support and/or effective remediation.

Corrective action plans derived from this process will mainly focus on identifying root causes of modern slavery and measures to prevent recurrence. Jervois recognizes the different capacities of our suppliers, particularly in communities around our operations and smaller and medium enterprises (“SMEs”) in general.

When appropriate, we commit to take measures to build our Supplier’s capacity to comply with the expectations and requirements outlined in the Supplier Standard. However, depending on the nature and severity of the incident and/or if the risk or impact is deemed unacceptable or where a supplier fails to cooperate with Jervois or implement corrective actions, the business relationship may be terminated.

Jervois refers to the UN Guiding Principles for direction concerning our responsibility for remedy in cases where we have been found to have caused compared to directly contributed to modern slavery compared to cases where our operations are indirectly linked to the harm caused. We recognize that, depending on the case at hand, an indirect link does not prevent us from taking an active role in the process.

Monitoring and Evaluation

In 2021, no reports, concerns or complaints received via our whistleblower or grievance mechanisms pertained to modern slavery. No incidents were recorded concerning modern slavery. Three warning signs related to potential human and labor rights issues were identified within our supply chain during 2021. Corrective action plans have been implemented with further investigations and related-site audits planned in 2022.

While these indicators provide valuable insight, Jervois recognizes that we must adopt more explicit measures to evaluate our effectiveness in identifying and addressing modern slavery risks, including within and beyond our Tier 1 supply chain. In 2022, we plan to integrate modern slavery indicators within our broader ESG framework, including our KPIs, and ensure supporting activities are accordingly adapted in scope. This includes our training and incident management procedures, supplier due diligence and engagement efforts and M&E frameworks for environmental, OHS, labour and community programs.

Jervois’ program for mineral supply chain due diligence is subjected to 3rd party auditing and disclosure of our public audit reports in association with our conformance with the RMI.

Although our ESG commitments and practices are expanding rapidly, Jervois is launching its inaugural sustainability report in 2022 and is yet to undergo a 3rd party audits of our ESG policies, procedures, practices and performance, including those concerning modern slavery.

Due Diligence across our Mineral Supply Chains

JFO is the first cobalt chemical producer in the world to achieve Conformant Downstream Facility status through the Responsible Minerals Initiative’s (RMI’s) Downstream Assessment Program. In conjunction with this, JFO annually releases a [Public Due Diligence Report](#) that outlines its management systems, procedures and controls for risk identification, assessment and mitigation in its mineral supply chains.

As detailed in the 2021 report covering, JFO identified, investigated, conducted root cause analysis and took corrective actions for 4 suspected cases in their upstream mineral supply chains. Three (3) of the four were a response to warning signs concerning army activity in a high-risk sourcing area, potential human rights/labour violations and potential artisanal production in a Finnish supply chain. The fourth related to a shipment with broken/different seals. All four cases were investigated, corrective actions taken and were closed in one case or closed with ongoing monitoring in three cases.

Through their due diligence process, the company reported (among other metrics): 0 grievances through the RMI Grievance Mechanism or other sources; 0 deviations from the internal systems of control; 0 risks prompting a high-risk supplier to conduct an on-the-ground assessment of their supply chain. In terms of risk mitigation, 0 suppliers were discontinued or suspended. Five potential suppliers were excluded from consideration as suppliers due to risks associated with unknown origin of material.

The full report can be accessed at: www.jervoisfinland.com/sustainability/.

Consultation Across our Business

JFO has well-established, mature systems and procedures for both mineral and non-mineral supply chains due diligence. Efforts in 2021 have included strengthening peer-to-peer coordination and building capacity between our operations with a view towards harmonizing approaches and achieving buy-in at all levels. This includes at Board and senior management levels and within and between key management and personnel at operations level.

This Statement has been drafted through an internal consultation, review and validation process including with our senior management team and those performing key

functions in our operations related to human resources, procurement, EHS and community engagement as well as with our commercial team.

Building upon our focused efforts concerning mineral supply chains and related due diligence expectations, modern slavery has been an ongoing topic of discussion with members of our senior management team and our ESG and Compliance Committee. The Statement has additionally been discussed, reviewed and approved by our Board, who oversees matters concerning our human rights policies and performance.



Future Actions



Future Actions

We are committed to further improving our response to modern slavery risks in our operations and supply chain. In 2022, priority actions will include the following :

Improve our Understanding of Risks in our Business and Supply Chains

- Expand the scope of our current Know-Your-Supplier and Know-Your-Customer due diligence process and refine self-assessment questionnaires for existing and prospective suppliers.
- Increase Tier 1 supplier and customer engagement to promote mapping of their business and supply chains, disclosure of risks and responses and adoption of measures to exert similar influence.
- Identify reliable data platforms and sources to improve risk analysis.

Strengthen our Capacity to Identify, Assess and Address Risks

- Ensure inclusion of modern slavery and other human rights risks in corporate, management and operations-level training and vendor onboarding.

- Identify entry points within existing standards and procedures to integrate modern slavery and other human rights risks including those related to procurement, human resources, and related contracting.
- Refine and adapt our auditing procedures used for minerals supply chains to non-mineral suppliers.
- Collaborate with private sector associations, civil society organizations, human rights experts, and others to improve our policies, procedures and practices.

Effectively evaluate our performance

- Integrate modern slavery indicators within our ESG M&E and reporting and Key Performance Indicators (KPIs).

Signature

This Modern Slavery Statement was approved by the Board of Directors of Jervois Global on 11 March 2022



Peter Johnson
Non-Executive Chairman
Jervois Global

Jervois

