

29 December 2018

## Mint of Finland Conflict Minerals Policy

### Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas Policy

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that Mint of Finland has the responsibility to respect human rights and avoid contributing to conflict, Mint of Finland hereby adopts and will widely disseminate this policy on responsible sourcing of tin, tantalum, tungsten and gold ("conflict minerals") from conflict-affected and high-risk areas. Mint of Finland commits to refrain from any action which contributes to the financing of conflict and commits to comply with relevant United Nations sanctions, resolutions or, where applicable, domestic laws implementing such resolutions.

#### **I. Serious abuses associated with the extraction, transport or trade of conflict minerals:**

If sourcing from, or operating in, conflict-affected and high-risk areas, Mint of Finland will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- a) any forms of torture, cruel, inhuman or degrading treatment;
- b) any forms of forced or compulsory labor, which means work or service which is exacted from any person under the threat of penalty and for which such person has not offered himself voluntarily;
- c) illegal child labor;
- d) other human rights violations and abuses; or
- e) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

#### **II. Risk management of serious abuses:**

Mint of Finland will immediately suspend or discontinue engagement with suppliers where Mint of Finland identifies a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in section I.

#### **III. Direct or indirect support to non-state armed groups:**

Mint of Finland will not tolerate any direct or indirect support to non-state armed groups which illegally contribute to the extraction, transport, trade, handling or export of conflict minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of conflict minerals 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:

- a) illegally control mine sites or otherwise control transportation routes, points where conflict minerals are traded or other actors in the supply chain;
- b) illegally tax or extort money or conflict minerals at points of access to mine sites, along transportation routes or at points where conflict minerals are traded; or
- c) illegally tax or extort intermediaries, export companies or international traders.

#### **IV. Risk management of direct or indirect support to non-state armed groups:**

Mint of Finland will immediately suspend or discontinue engagement with a supplier if Mint of Finland identifies a reasonable risk that the supplier is sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in section III.

#### **V. Public or private security forces:**

1. Mint of Finland will not directly or indirectly support public or private security forces who illegally control mine sites, transportation routes or other actors in the supply chain, illegally tax or extort money or conflict minerals at point of access to mine sites, along transportation routes or at points where conflict minerals are traded or illegally tax or extort intermediaries, export companies or international traders.

2. Mint of Finland recognizes 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.

3. "Direct or indirect support" does not refer to legally required forms of support, including legal taxes, fees, and/or royalties that companies pay to the government of a country in which they operate.

#### **VI. Risk management of Public or private security forces**

In the event Mint of Finland determines that a supplier has provided direct or indirect support to public or private security forces identified herein, Mint of Finland will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in section V above. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

Within six months from the adoption of the risk management plan Mint of Finland will suspend or discontinue engagement with that supplier after failed attempts at mitigation.

#### **VII. Bribery and fraudulent misrepresentation of the origin of minerals:**

In compliance with existing Mint of Finland Ethical Guidelines, Mint of Finland Business Partner Code of Conduct and other applicable policies and regulations prohibiting Mint of Finland employees from engaging in acts of bribery related to Mint of Finland business practices, Mint of Finland will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

#### **IX. Money laundering:**

Mint of Finland supports efforts to contribute to the effective elimination of money laundering where there is 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

#### **X. Payment of taxes, fees and royalties due to governments:**

Mint of Finland will ensure that all taxes, fees and royalties related to mineral extraction, trade or export from conflict-affected and high-risk areas are paid to governments.

#### **XI. Risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments.**

Mint of Finland commits to engage with suppliers, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. Mint of Finland will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.