

IONEER

Supplier Code of Ethics Policy

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0	Kori Iverson	Ken Coon	X	6/23/2021	Original Draft
1	Kori Iverson	Matt Weaver	X	8/25/22	Update
2	Kori Iverson	Matt Weaver	X	10/26/22	Updated Feedback
3	Kori Iverson	Directors	X	2/23/2023	Updated Format
4	Kori Iverson	Manager	X	2/28/23	Insert Community & Enviro
5	Kori Iverson	Matt Weaver		4/1/24	EHSS update



1 PURPOSE

This Policy is intended to govern the conduct of Ioneer's Suppliers when doing business in connection with Ioneer.

For this Policy, a "Supplier" is defined as a commercial company who provides goods and/or services, and receives payment, for any aspect of Ioneer's operations including exploration, development, construction, operations and reclamation. Excluded from this definition of "Suppliers" are all transactions involving land purchases or leases, government agencies and/or utilities, financial intuitions, charitable organizations, other Ioneer entities, joint venture partners and other mining companies. Suppliers and Suppliers are to comply with this policy as well as any contractual terms in its contract with Ioneer.

2 DEFINITIONS

EHSS- Environmental, Health, Safety and Sustainability

TSM- Towards Sustainable Mining

Improper Advantage- obtaining something to which the person or entity giving an Item of Value was not entitled or would not have received but for giving the Item of Value

3 SCOPE

Ioneer's conduct of business around the world is guided by its commitment to operating in a socially responsible manner. Ioneer is committed to bringing long-term sustainable benefits to the communities where it operates and fostering a culture of excellence and collaboration among its employees. By upholding its core values, Ioneer earns the trust of its stakeholders and creates shared value.

Ioneer further expects Suppliers to support Ioneer's ESG initiative through the application of this Supplier Code of Ethics whenever they are onsite or present within the community. This commitment means that Ioneer and its Suppliers share a common set of objectives and benefit from the achievement of those objectives.

This Policy has been designed to help Suppliers understand their responsibilities and to create an awareness of the business and ethical standards that they must follow in their business dealings with, or on behalf of, Ioneer. Ioneer's values are held at the highest level of all standards in integrity, honesty and the ethical standards. Suppliers are required to follow these standards and review the standard on a regular basis.

4 STANDARD (WHAT, WHEN, WHY, HOW)

4.1 COMPLIANCE WITH LAWS:

Suppliers must comply with all applicable laws, rules and regulations and supplier code of ethics in every jurisdiction in which they do business with, or on behalf of, Ioneer. Local laws may in some instances be less restrictive than the principles set forth in this Code. In those situations, Suppliers are expected to comply with this Code, even if the conduct would otherwise be legal under applicable laws. If local laws are more restrictive than this Code, Suppliers are expected to, at a minimum, comply with applicable local laws. The Supplier Code of Ethics standard can only be met with the Suppliers' cooperation. Through the efforts of Ioneer's Suppliers, the Supplier Code of Ethics will set the standard for others to

follow. If a Supplier has their own code of ethics policy, they must provide Ioneer with a copy of the policy. All Suppliers must complete the certification process described below as part of their Supplier set-up / on-boarding process.

4.2 HEALTH AND SAFETY

Suppliers must be committed to respecting the safety and health of workers and creating safe working conditions and a healthy work environment for all of their workers who provide goods or services. Suppliers should implement an effective and efficient health and safety program. Suppliers should anticipate, identify, and assess emergency situations and events and minimize their impact by implementing emergency plans and response procedures. Each supplier must comply with Ioneer's Safety and Health Policy, Supplier Safety and Health Standard and all related Standards and Procedures.

4.3 COMMUNITY

It is the expectation that all Suppliers working on behalf of Ioneer while at the Rhyolite Ridge Project must know how to respectfully present themselves, and that they maintain positive relationships and avoid adverse impacts on communities and the environment.

As with any projects located on public lands, all mine operators must maintain a social license to operate – and accordingly it is of paramount importance that all Suppliers conduct themselves professionally while they are in the community – both during and outside of working hours.

The following should be observed and adhered to:

- While in the community all Suppliers are expected to behave, ethically, honestly, professionally, respectfully, and responsibly.
- Any activity that causes damage to the reputation of either Ioneer or its Suppliers, including without limitation lewdness, public intoxication, etc. are strictly prohibited.
- Discrimination, harassment, or violence of any kind Supplier– whether during working hours or not - **will not be tolerated.**
- All questions from the community about Ioneer or the Rhyolite Ridge Project must be referred to the Ioneer Government and Public Affairs Manager. At no point should any Supplier, without having express permission to do so, communicate on behalf of Ioneer.
- Recognize and respect local authorities and government officials, as well as the leaders of local communities.
- The Fish Lake Valley HotBox (a geothermal hot spring) is located between the main road and the Project site and is a treasured asset of the community. Please be courteous to other users if you choose to recreate in and around the facility. Do not bring glass bottles into the Hot Box and do not harass or harm local wildlife that are also present.
- **Non-recreational** camping on public lands, including the Fish Lake Valley Hot Box, that serves as "lodging" for suppliers or employees, is prohibited while working for Ioneer.
- Leave No Trace – Be sure to pack out any items that you have brought to site – especially trash.

- Any trash generated must be disposed of properly within designated facilities.
- Speed limits on all public highways and local county roads must be strictly followed with no exceptions.
- While travelling on non-paved roads in the community, please reduce speed to minimize dust. If there is a dust trail coming from your vehicle, you are travelling too fast.
- Wildlife including horses, deer, and antelope are often present on highways – be aware especially outside of daylight hours.
- All travel to the project site will strictly follow all posted signs. Especially the speed of travel, critical habitat, and use of jake brakes.

Commitment to Supporting Local Business and Entrepreneurship

- Ioneer anticipates that several business opportunities will become available during construction and operations, and Ioneer strives to support and work with local individuals and businesses. To this end, Ioneer is committed to supporting community members and businesses by way of entrepreneurial support and business coaching to maximize local participation and benefits from the Rhyolite Ridge Project.

4.4 ENVIRONMENTAL

Environmental awareness is a fundamental component of every activity at Ioneer's properties.

It is the responsibility of each supplier to ensure that its employees comply with Ioneer's environmental policies and procedures.

As part of our commitment to the environment, Ioneer requires that all work performed for Ioneer comply with applicable requirements. "Applicable Requirements" refers to:

- All Ioneer environmental permits,
- any federal, state, county, or municipal law, regulation, ordinance or code, and
- Ioneer requirements.

Where there is a conflict between applicable requirements, the one most protective of the environment shall apply. It is the supplier's responsibility to ensure that these requirements are met.

4.5 FINANCIAL CONTROLS

Suppliers working with Ioneer will keep accurate, complete, fair, timely transparent and understandable financial and occupational records, accounts, and statements. Supplier will endeavour to invoice accurately with information that effectively communicates why payment should be issued. Supplier will keep all records confidential and never share non-public information. Supplier will comply with insider trading laws including the prohibition against buying or selling securities or advising others to buy or sell securities while aware of material, non-public information relating to Ioneer.

4.6 ANTI-CORRUPTION:

Supplier must comply with all applicable anti-corruption laws, including the United States and the Foreign Corrupt Practices Act of 1977. In doing so, Suppliers are expected not to provide or promise

anything of value to (i) a government official for the purpose of improperly influencing the government official's decisions or actions with respect to the goods or services that the supplier is providing to loneer, or (ii) to loneer employees.

4.7 HUMAN RIGHTS:

Suppliers must support and respect the protection of internationally proclaimed human rights and ensure that they are not complicit in human rights abuses. Suppliers must comply with the International Bill of Human Rights in providing goods and/or services to loneer. Loneer does not tolerate threats, intimidation, or attacks against human rights defenders.

4.8 LABOR:

Suppliers are expected to comply with the International Labor Organization's Declaration of Fundamental Principles and Rights at Work. As part of the TSM Guiding Principles, Suppliers commit to respecting the rights of workers and not engaging in practices of forced or child labor, as defined in ILO Conventions 29, 138 and 182, in part, by ensuring no child under 15 is employed.

Suppliers should uphold:

- The freedom of association and the effective recognition of the right to collective bargaining
- The elimination of all forms of forced and compulsory Labor
- The effective abolition of child Labor
- The elimination of discrimination in respect of employment and occupation

4.9 SUPPLIER DIVERSITY:

loneer is committed to ensuring, to the maximum extent possible, the fair inclusion and utilization of minority and disadvantaged owned vendors in all tender packages (Tribal, Minority, Veteran, and Women Owned).

4.10 ETHICS:

Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, Suppliers, government and regulatory authorities and loneer. Suppliers must uphold fair business standards in advertising, sales and competition. Suppliers and their employees or Suppliers must act in a fair and impartial manner and should avoid both real and perceived conflicts of interest in the business they do with or on behalf of loneer. Suppliers must disclose information regarding their business activities, structure, financial situation, and performance in accordance with applicable law and prevailing industry practices. Suppliers must safeguard customer information in accordance with applicable law. Suppliers must maintain all confidential information about, or provided by, loneer in strict confidence, except when disclosure is authorized by loneer or legally mandated. Suppliers must respect intellectual property rights in their business dealings with, or on behalf of, loneer. Transfer of technology and know-how must be done in a manner that protects intellectual property rights.

4.11 CERTIFICATION:

Suppliers must review this Supplier Code of Ethics Policy at least annually and confirm that they have read and understood these policies by accepting the contract/PO and performing work.

In case of non-compliance, loneer may collaborate or assist suppliers to become compliant. Loneer reserves the right to stop dealing with Suppliers who fail to comply with this Policy.

4.12 WAIVERS:

Waivers of this Policy may only be granted by Ioneer's Director of Supply Chain Management.

4.13 CONFLICTS OF INTEREST:

Supplier and their employees and family members will not receive improper advantage through their relationship with Ioneer or allow other activities to conflict with acting in the best interests with Ioneer.

4.14 DISTRIBUTION:

The Corporate Supply Chain Department is responsible for communicating this Policy. This Policy will be located on the Ioneer intranet sites. It is the Supplier's responsibility to review the policies online on a regular basis, notifications will not be sent.. Check the site on a regular basis for updates.

Reporting concerns must promptly report any business conduct or ethics concerns involving or affecting Ioneer by contacting one of the following: +1 775 382 4800

5 WORKING ONSITE

Each supplier is expected to comply with all Ioneer governance provided in contract documents and in onboard training, in addition to MSHA/OSHA requirements.

6 APPENDIX

[Corporate Governance - Ioneer](#)

Exhibit A- New Supplier form (example)



EFT AUTHORIZATION

PART 1: Vendor Information (please type or print):

Company Name _____
 Mailing Address _____
 Suite # _____
 City, State, County _____
 Description of Services/Goods: _____
 RFQ Contact _____
 RFQ Email _____
 Telephone Number _____
 MSHA ID # _____
 Contractor License _____
 State of Incorporation _____

Please check the appropriate box:

Individual/Sole Proprietor Corporation Partnership LLC

Remittance Information:

Company Name _____
 Remittance Address _____

 Accounting Email _____
 Telephone Number _____
 NAICS Code _____
 Payment Terms Net 30 _____
 Dunn& Bradstreet# _____

Does your company assess, collect, and remit sales tax to the State of Nevada:

Yes No Tax Exempt Rate % _____

Taxpayer Identification Numbers: Please remit completed IRS Form W-9/W8 (attached)

Employer Identification Number _____
 or
 Social Security Number _____

Is this a Tribal Owned Business? Yes No Type: _____

Is this a Minority Owned Business? Yes No Type: _____

Is this a Veteran Owned Business? Yes No Type: _____

Is this a Women Owned Business? Yes No Type: _____

- Does the company employ anyone under the age of 18 for hazardous work? _____
- Does the company employ anyone in a forced labor capacity? _____
- What is your LTIR, first aid, and fatality rate for the last 5 years? _____
- Are working hours limited to applicable local law maximums? _____
- Are wages and benefits compliant with local wage laws? _____
- Do employees have the Freedom of Association? _____
- Has the company had any notices of violation or fines for lack of enviro or safety compliance in the last 5 years? _____
- Does the company have Anti-Bribery and Anti- Corruption Policy? _____

EXHIBIT A – Towards Sustainable Mining (example)

Prevention of Child and Forced Labour

Did You Know?

Modern slavery is far more pervasive than Canadians think. All over the world, people can become entrapped making clothes, serving food, picking crops, working in factories, or working in homes as cooks, cleaners, or nannies.

From the outside, it can look like a normal job. In reality, people are unable to escape in the face of violence, debt, loss of personal identification and threats of deportation. Worse, one in four of those in forced labour are children and three-quarters are women and girls.

What is Towards Sustainable Mining (TSM)?

A globally recognized sustainability program that helps mining companies manage their environmental and social responsibilities and evaluate and publicly report their performance

A mandatory requirement for companies in a growing number of mining associations around the world, offering tools to drive continuous performance improvements

Preventing Child and Forced Labour

The **TSM Prevention of Child and Forced Labour Verification Protocol** differs from other TSM Protocols in that child and forced labour are issues to be avoided rather than managed for continuous improvement. The protocol therefore requires companies to ensure that:

- No child under the age of 18 engages in work that could be dangerous and no child under the age of 15 is employed at the mine site
- Forced Labour is not used and, where there is a high risk of forced labour, processes are in place to monitor supply chains and relationships with recruitment agencies

How Can Companies Prevent Forced Labour?

- Avoid placing unreasonable restrictions on employees' freedom of movement in relation to the mine site
- Avoid retaining original copies of employee personal documentation, such as identity papers
- Prohibit requiring any form of deposit or recruitment fee from employees either directly or through recruitment agencies
- Avoid practices that prevent employees from terminating their employment after reasonable notice or as permitted by law

Advancing Sustainable Development Goals

When following the Prevention of Child and Forced Labour Verification Protocol, mining companies work to advance the **Sustainable Development Goals**.

- **Contributing to the eradication of forced labour** by verifying that no form of forced labour is used at their operations and, in areas of greater risk, introducing measures to monitor workforce recruitment and labour used in supply chains
- **Preventing child labour** by verifying that the company's workforce meets the minimum age requirements set out by the International Labour Organization.



For more information, visit: mining.ca



International Labour Organization Conventions

The TSM Prevention of Child and Forced Labour Verification Protocol is grounded in a set of conventions from the **International Labour Organization**. These include:

- **Forced Labour Convention:** This convention defines forced labour as "all work or services which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily". It specifically prohibits the use of forced labour for the benefit of private companies.
- **Minimum Age Convention:** This convention establishes minimum age requirements for child labour at 15 years of age and further establishes 18 years of age as the minimum age for work that could be considered dangerous to young people.
- **Worst Forms of Child Labour Convention:** This convention identifies the worst forms of child labour and requires that preventative measures be taken. This includes all forms of slavery and work that is likely to harm the health, safety, or morals of children.

Case Study: Protecting Girls in Mali

B2Gold is strongly committed to the protection of human rights, including the prevention of child and forced labour. The company has a series of policies, standards and procedures to ensure that neither child nor forced labor occurs within its operations, including within its supply chain.

B2Gold has also implemented programs that go beyond its operations. Near its Fekola Mine in Mali, B2Gold and UNICEF have partnered in the Kéniéba mining district, one of the most important gold producing areas in Africa and home to substantial artisanal mining. A traditional livelihood and common activity, artisanal mining also poses significant risks of child and forced labour, especially to girls.

The B2Gold/UNICEF partnership includes initiatives to provide:

- Daycare services to mothers with children under 5 years
- Education and training at mobile sites to children aged 6-10
- Accelerated schooling for children aged 9-12
- Psychosocial support, adolescent support groups, and education and training for teens, especially girls, including information on healthy relationships and gender-based violence.

By supporting children to have access to education and child protection services, the partnership aims to provide a better future to children away from artisanal mining sites and child labour.

