

# **Ocean Partners Sustainability Policy**

*November 1<sup>st</sup> 2018*

## What is Ocean Partners vision on sustainability?

*“To conduct our business responsibly, to the benefit of all stakeholders and with reference to relevant Sustainable Development Goals as set by the United Nations”*

# What are the UN's Sustainable Development Goals?

The SDGs, or Global Goals for Sustainable Development, are a collection of 17 global objectives set by the United Nations in 2015.

The 17 goals focus on global social, environmental and economic issues. Their purpose is to produce positive and lasting change across key development problems in all countries.

The official title for the project is 'Transforming our World: the 2030 Agenda for Sustainable Development'.



# What does Ocean Partners do?

## **Trading copper, lead and zinc concentrates together with by-products, precious & minor metal concentrates**

- Working directly with miners, smelters, and refiners;
- Handling, packing, and transporting traded materials in accordance with IMO, international, and regional regulations;
- Working with independent representatives to ensure proper weighing, sampling, and moisture procedures are in place in order to minimise risks.

## **Warehousing and blending services**

### **Agency services**

- Marketing and administration services for mines.

### **Consulting**

- Marketing studies for existing mines and potential new projects

## **Trade and project finance**

### **The group employs in the region of 120 people of which approximately 30 are based in the UK.**

- Main trading offices in UK, US, Mexico and Peru.
- Strong presence in Hong Kong, Taiwan, Canada, Mongolia, Australia, South Africa and China
- Worldwide network of agents

# Which sustainability topics and issues is it material for Ocean Partners to have a policy on?



## End poverty in all its forms

- Anti-slavery & human trafficking policy.



## Ensure healthy lives and promote well-being for all at all ages

- Policies regarding health and safety for Ocean Partners employees, third party contractors and business partners.



## Achieve gender equality and empower all women and girls

- Equal opportunities policy



## Ensure sustainable consumption and production patterns

- Supply chain management and due diligence.
- Tracking the source of the goods that we trade.



## Conserve and sustainably use the oceans, seas and marine resources for sustainable development

- Sea freight of hazardous materials.



## Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

- The environmental impact of Ocean Partners blending facilities
- Export and import of hazardous materials.



## Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

- Anti bribery policy
- Anti tax evasion policy.
- Charitable donations

# How is sustainability currently organised at Ocean Partners?

Current  
Status

**Compliance with the Ocean Partners Holdings Limited (OPHL) Code of Conduct is mandatory for all employees worldwide. The code goes beyond legal minimums and covers the ethics and business conduct expected from all employees including:-**

- Compliance with all applicable laws, rules, and regulations.
- Dealing with public officials and political contributions.
- Fairness and equal opportunity.
- Harassment and violence free workplace.
- Insider information.
- Health & safety.
- Disclosure of confidential information.
- Accuracy of financial book-keeping and records.
- Personal information.
- Corporate opportunities and conflicts of interest.
- Responsibility to report violations to the code to senior management.

**To supplement the OPH Code of Conduct described above senior management has issued additional policies.**

- Anti slavery and human trafficking policy – November 2017.
  - *Applies to all OPH employees, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners*
- Anti tax evasion policy – December 2017

**The company's Managing Director acts as compliance officer and is responsible for oversight and enforcement of issues relating to the Ocean Partners Holdings (OPH) Code of Conduct and associated policies.**

# Anti-slavery & human trafficking policy



## End poverty in all its forms

- Anti-slavery & human trafficking policy.

Current  
Status

- OPHL Anti-slavery & Human Trafficking Policy commits the company to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
  - *Anti-slavery training provided to OPHL employees during 2018.*
  - *Anti-slavery statement posted on the company's public website – [oceanpartners.com](http://oceanpartners.com)*

# Health and safety



## Ensure healthy lives and promote well-being for all at all ages

- Policies regarding health and safety for Ocean Partners employees, third party contractors and business partners.



Current Status

The icon is a grey inverted triangle with the text 'Current Status' inside.

- Under the OPH Code of Conduct the company is committed to providing its Team Members with safe and secure workplaces that meet or exceed the laws and governmental requirements with respect to occupational health and safety in the jurisdiction where the workplace or facility is located.
- The company requires third party contractors such as the suppliers of warehouse facilities and blending services to have health and safety policies that meet or exceed relevant laws and governmental requirements. The company also actively encourage its business partners to implement working procedures that reflect industry best practice.
- Specific measures undertaken to counter the hazards associated with dust exposure at the company's blending facilities include:-
  - *Provision of appropriate safety equipment including respirators.*
  - *Warehouses equipped with appropriate ventilation and filtration equipment*
  - *Hazard briefings and health education provided to workers,*
  - *Regular medical checks and blood tests for employees*
  - *Investment in enclosed conveyor belt systems and negative pressure system at our European blending facility. This operation complies with the requirements of the Seveso Directive.*



# Equal opportunities



## Achieve gender equality and empower all women and girls

- Equal opportunities policy

Current  
Status

- As an equal employment opportunity employer, OPHL complies with all laws and regulations concerning non-discriminatory employment practices.

# Supply chain management



## Ensure sustainable consumption and production patterns

- Supply chain management and due diligence.
- Tracking the source of the goods that we trade.



### Current Status

- Any new supplier or customer must satisfy 'Know Your Counterparty' (KYC) checks including:-
  - *Full financial review*
  - *Background checks on directors and company history.*
  - *In countries such as the Democratic Republic of Congo, OPHL will only conduct business with large established mining companies and then only providing the KYC checks described above have been satisfied.*
- Ocean Partners supports the goals and objectives of Section of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, which aims to prevent the use of "Conflict Minerals" that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries.
- Ocean Partners has been actively involved in schemes to provide small scale and artisanal miners with technical, financial and professional assistance to enable them to operate legally.

## Sea freight



**Conserve and sustainably use the oceans, seas and marine resources for sustainable development**

- Sea freight of hazardous materials.



Current  
Status

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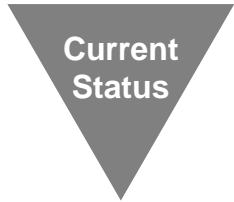
- OPHL makes every effort to ensure that ships chartered on its behalf are compliant with all relevant International Maritime Organisation (IMO) regulations. Requirements include:
  - *Vessels being properly equipped and holding the appropriate certification to carry a particular cargo.*
  - *Health and safety procedures.*
  - *Crew training*
  - *Compliance with the International Convention for the Prevention of Pollution from Ships (MARPOL)*
  - *Financial background of ships owners and operators*
  - *Checks that ships are not subject to international sanctions.*
  - *Age of vessel - Approximately 90% of ships chartered on behalf of OPHL are less than 20 years old*

## Environmental impact



**Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss**

- Export and import of hazardous materials.
- Environmental impact of our blending operations



- Ocean Partners is responsible for accurately reporting the constituents of concentrates, blends or other materials to its customers and to the relevant authorities in importing countries.
  - *Accurately categorising material according to the relevant HS Codes*
  - *Preparation of Material Safety Data Sheets (MSDS)*
  - *Certificate of Origin when required.*
  - *Legally compliant packaging and labelling*
- Ocean Partners is committed to ensuring that the environmental performance of its blending facilities meets or exceeds the legal requirements in the countries where they are located. Initiatives in this respect include:
  - *Use of 'Rotainers' to minimise dust pollution at our Asian blending facility*
  - *Dredging and sampling to ensure compliance with local EPA standards*
  - *Provision of water trucks and street sweepers*

## Society



**Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.**

- Anti bribery policy
- Anti tax evasion policy.
- Charitable donations

### Current Status

- The OPHL Code of Conduct specifically prohibits giving or receiving inappropriate pecuniary or other benefits.
- Ocean Partners is responsible for accurately reporting the constituents and country of origin of materials it trades so that any relevant taxes or tariffs are paid accordingly.
- Ocean Partners 'Anti Tax Evasion Policy' affirms the company's zero tolerance approach to all forms of tax evasion.
- OPHL Annual tax strategy available on the company's public website – [oceanpartners.com](http://oceanpartners.com)
- Transfer pricing between Ocean Partners group companies located in our main operating countries is subject to a full analytical audit and benchmarking study by an external accounting firm which is updated annually.
- Ocean Partners will make donations to charities nominated by employees amounting to around \$100K during 2018.

## Continuous improvement on sustainability issues

A circular orange icon containing the text "Potential Future plans" in white, sans-serif font.

Potential  
Future  
plans

Ocean Partners Holding Limited (OPHL) is committed to a policy of continuous improvement with regard to its policies on sustainability issues. This commitment includes, but is not limited to the following:-

- Review of how sustainability is organised and reported within OPHL
- Communication regarding appropriate sustainability issues to all OPHL employees.
- Ensuring all OPHL employees 'buy-in' to sustainability policy.
- Communicating OPHL sustainability principles to suppliers and customers.
- Arranging training for OP employees on relevant issues.
- Proactive identification of new sustainability topics and issues for which it would be material for OPHL to have a policy on.
- Establishing industry 'best practice' on relevant sustainability issues and seeking to implement these in our supply chain.
- Eliciting advice from specialist consultants where required.
- Define and monitor 'key performance indicators' (KPIs) pertaining to sustainability issues.
- Co-ordinating dialogue with relevant stakeholders on sustainability issues.
- Encouraging insights and ideas on sustainability issues from OPH staff and business partners.
- Investigate the possibility of joining or supporting relevant organisations promoting social responsibility.