



Code of Conduct

Eurobattery Minerals AB

Version 1.3 / Date: 16 February 2026

1. Purpose and Commitment

Eurobattery Minerals AB is committed to conducting its business with the highest standards of integrity, responsibility, transparency, and respect for people and the environment. Our purpose is to enable the sustainability transition by providing responsibly mined minerals from Europe – for Europe.

This Code of Conduct (the “Code”) sets out the fundamental principles that guide how we operate and how we expect individuals acting on our behalf to behave. We believe that mining can and must be done responsibly, and that long-term value creation depends on trust, safety, ethical conduct, and social acceptance.

2. Scope

This Code applies to Eurobattery Minerals AB and all subsidiaries – including FinnCobalt Oy and Tungsten San Juan S.L. – and to all individuals acting on behalf of the Company, regardless of role or location, including:

- Employees and temporary staff
- Management and Board members
- Contractors and consultants
- Suppliers and other business partners where relevant

In the event that local laws, regulations, or collective agreements should impose stricter requirements than this Code, the stricter requirement applies.

3. Responsibilities

Everyone covered by this Code is responsible for:

- Understanding and complying with the Code and applicable laws
- Acting ethically and responsibly in all business activities
- Speaking up and reporting concerns in good faith when they observe potential violations
- Cooperating with investigations and audits when requested

Managers are responsible for leading by example, ensuring their teams understand the Code, creating an environment where concerns can be raised without fear, and taking prompt action when issues arise.

4. People, Safety and Wellbeing

4.1 Health, Safety and a Zero-Harm Culture

The health, safety and wellbeing of people is our highest priority. Eurobattery Minerals strives for a zero-harm culture, recognizing that all injuries and occupational illnesses can and must be prevented.

We commit to:

- Providing safe and healthy workplaces and complying with health and safety laws and permit requirements
- Identifying, assessing and managing risks before work begins (including task risk assessments and safe work procedures)
- Ensuring appropriate training, competence, supervision and personal protective equipment
- Encouraging reporting of incidents, near-misses and unsafe conditions, and acting promptly on corrective actions
- Learning from incidents and continuously improving our safety performance

Safety considerations shall never be compromised for operational or financial reasons.

4.2 Substance-Free Workplace

All employees, contractors and visitors must be fit for work. The use of alcohol, illegal drugs or other substances that may impair work performance is strictly prohibited during work activities or within work areas.

Our approach prioritizes prevention, guidance and support, while recognizing that testing may form part of safety practices where legally permitted and appropriately communicated.

5. Human Rights and Labour Standards

Eurobattery Minerals respects internationally recognized human rights and is committed to fair and lawful working conditions, consistent with the UN Guiding Principles on Business and Human Rights and relevant ILO core conventions.



We have zero tolerance for:

- Child labour
- Forced or compulsory labour
- Modern slavery or human trafficking

Employment conditions shall be fair, transparent and compliant with applicable legislation, including wages, working hours, freedom of association and the right to collective bargaining, and non-retaliation for raising concerns.

5.1 Equality, Diversity and Respect

We value diversity and treat everyone with dignity and respect. Discrimination, harassment, bullying or inappropriate behaviour is not tolerated under any circumstances.

We are committed to:

- Equal opportunities in recruitment, development and promotion
- A respectful and inclusive working environment
- A low threshold for reporting inappropriate behaviour and prompt, fair handling of cases

6. Environment and Responsible Mining

6.1 Responsible Mining Practices

Eurobattery Minerals recognizes that mining activities have environmental and social impacts. Our responsibility lies in how these impacts are minimized, managed and transparently addressed across the full project life cycle—from exploration to closure.

We commit to:

- Complying with environmental laws, permit conditions and reporting requirements
- Protecting water, soil, air and biodiversity through prevention, control and monitoring
- Reducing greenhouse gas emissions and improving energy efficiency where feasible
- Managing waste responsibly and promoting circularity where possible
- Planning for mine closure and long-term environmental responsibility, including rehabilitation and post-closure monitoring
- Applying recognized best practices, including Towards Sustainable Mining (TSM) where applicable

7. Communities and Social Acceptance

7.1 Community Engagement

We believe that mining projects require social acceptance and trust to succeed. Eurobattery Minerals is committed to open, transparent and continuous dialogue with local communities, authorities and stakeholders.

We seek to:

- Engage early and listen actively
- Share relevant information in a timely and understandable way
- Address concerns respectfully and constructively
- Operate in a predictable and transparent manner
- Respect cultural heritage and local traditions

7.2 Local Content and Regional Value Creation

Eurobattery Minerals aims to ensure that the regions in which we operate benefit from our activities. We prioritize:

- Local employment
- Regional suppliers and service providers
- Long-term cooperation with local businesses and institutions

Our objective is to contribute positively to regional development and create shared value.

8. Ethical Business Conduct

8.1 Compliance with Laws and Regulations

We comply with all applicable laws, regulations and official requirements in the countries where we operate. This includes mining, environmental, labour, competition and financial market regulations.

8.2 Anti-Bribery and Anti-Corruption

Eurobattery Minerals has zero tolerance for bribery, corruption or improper influence. Offering, giving, requesting or accepting undue advantages is strictly prohibited.

Business hospitality, gifts and charitable contributions must be reasonable, transparent, properly documented, and never intended to influence decision-making.

8.3 Fair Competition and Conflicts of Interest

We compete fairly and transparently. Conflicts of interest—actual, potential or perceived—must be disclosed promptly and managed appropriately. Decisions must always be taken in the best interest of Eurobattery Minerals.

8.4 Insider Information and Market Integrity

As a listed company, Eurobattery Minerals strictly prohibits the misuse of inside information. All confidential and price-sensitive information must be handled in accordance with applicable market abuse regulations and internal policies (see the “Information and Insider Policy”).

8.5 Tax Responsibility

Eurobattery Minerals pays taxes correctly and transparently and applies zero tolerance towards tax evasion or aggressive tax practices.

9. Data Protection and Confidentiality

We respect privacy and protect personal data in accordance with applicable data protection legislation. Personal data shall be collected, used and shared only for legitimate business purposes and handled securely.

Confidential information – including trade secrets, exploration data, commercial terms and non-public information about the Company – must be safeguarded and used only for legitimate business purposes.

10. Suppliers and Business Partners

We expect suppliers and business partners to operate in line with this Code or equivalent standards. In particular, they are expected to:

- Comply with laws and regulations
- Respect human rights and labour standards
- Operate safely and responsibly and protect the environment
- Maintain appropriate controls to prevent bribery and corruption

Where feasible, we integrate these expectations into procurement and contracting processes, including due diligence, contractual clauses, and performance monitoring.

11. Reporting Concerns and Whistleblowing

Anyone who becomes aware of behaviour that may violate this Code has a duty to report it. Reports can be made in good faith to:

- A supervisor or manager
- Company management or Human Resources
- The designated whistleblowing channel (including anonymous reporting, where available)

All reports are handled confidentially to the extent possible. Retaliation against anyone reporting concerns in good faith will not be tolerated.

If you are unsure whether a situation violates this Code, seek guidance before acting.

12. Compliance, Monitoring and Consequences

Compliance with this Code is monitored as part of Eurobattery Minerals' governance and control systems. Violations may lead to corrective actions, disciplinary measures, termination of employment, or termination of contracts, depending on the severity and applicable law.

Where violations involve suppliers or partners, the Company may require corrective action plans or end the business relationship.

13. Entry into Force and Review

This Code of Conduct has been approved by the Board of Directors of Eurobattery Minerals AB and enters into force upon adoption. It is reviewed regularly and updated as necessary.

Owner: Board of Directors | Document steward: Christer Heljestrand (Corporate Relations Officer) | Next review: 16 June 2026