

California Transparency in Supply Chains Act of 2010 (SB 657) Disclosure

JX Nippon Mining & Mining USA, Inc. believes in the importance of international labor and human rights standards. As a company policy, we do not knowingly employ slaves or trafficked persons.

Further, we employ the following policies and procedures with respect to our business relationships with vendors, partners, and other parties requiring compliance with the laws in the United States and abroad.

Our purchasing order terms and conditions has language requiring compliance with all relevant laws.

We require our employees, temporary employees, members of our Board of Directors to comply with our Code of Business Conduct and Ethics. This includes a requirement to comply with all applicable laws, regulations, rules and regulatory orders.

We will have yearly training on slavery and human trafficking for our procurement staff, which will include training for all employees and managers who have direct responsibility with supply chain management.

While JX does engage suppliers with periodic audits and executive reviews, including site visits and requiring suppliers to provide evidence that they have been audited by independent outside auditors in accordance with ISO 14001, ISO 9000-2009, TS16949 or other equivalent standards, we do not specifically audit or engage in verification or audit procedures of our suppliers and our product supply chain with respect to slavery and human trafficking. Tracking the steps outlined above is the extent of our internal compliance procedures, and those are audited in accordance with our compliance policies.

Any questions or concerns about our policy should be directed to our Procurement Department at [Procurement @nmm-jx-group.com](mailto:Procurement@nmm-jx-group.com).