



ARAYBY FOR INDUSTRIAL AND TRADING COMPANY s.a.r.l.  
INDUSTRIAL ZONE - TAANAYEL - BEKAA - LEBANON

# Responsible global supply chain of minerals from conflict-affected and high risk areas **POLICY**

## **PURPOSE:**

ARAYBY's responsible global supply chain of minerals from conflict affected and high risk areas policy reflects the commitment of ARAYBY to have the responsibility to respect human rights and not contribute to conflict , and commit to adopt and incorporate in contracts with suppliers the following policy on responsible sourcing of minerals from conflict affected and high risk areas.

## **Overview:**

- This policy is applicable to Arayby entity and all suppliers that provides used batteries to ARAYBY.
- Requirements included: supply chain policy for a responsible global supply chain of minerals from conflict affected and high risk areas.
- Additional resources: OECD due diligence guidance for responsible supply chain of minerals from conflict affected and high risk areas.

## **Who should understand the requirements of this policy:**

- ARAYBY management
- ARAYBY supply chain/ suppliers.



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### **Background**

ARAYBY FOR INDUSTRIAL AND TRADING COMPANY S.A.R.L is a recycling refinery that purchases and recycles used batteries in order to extract the lead.

ARAYBY is committed to conducting its business, through its employees, directors, and officers, in compliance with applicable laws and overall in an honest and ethical manner. ARAYBY believes that a commitment to honesty, ethics and integrity is an essential foundation that builds trust with clients, shareholders and the community at large in which it operates.

### **Requirements:**

While the company has no industrial, or trading operations in conflict-affected and high-risk areas, used batteries purchased by ARAYBY in the course of its activities are originated from Lebanese areas.

Considering the human rights and other risks that may be connected to the extraction, trading, handling and exporting of minerals from conflict-affected and high-risk areas, and our commitment to support and contribute to the respect of human rights and ethics in business, ARAYBY adopts this specific policy on responsible sourcing of minerals from conflict-affected and high-risk areas and commits to submit it to its suppliers to serve as a common reference for conflict-sensitive sourcing practices and to promote risk awareness. ARAYBY has based this policy on the currently existing OECD Guidelines on the matter.

ARAYBY does not wish to take part in any action that contributes to the financing of conflict and subscribes to the relevant United Nations sanctions resolutions or, where applicable, the domestic laws implementing such resolutions.

When sourcing minerals from, conflict-affected and high-risk areas, ARAYBY will neither tolerate nor profit from, contribute to, assist with or facilitate the commission by any party of:





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- any form of torture, cruel, inhuman and degrading treatment;
- any form of forced or compulsory labor;
- any form of child labor;
- other gross human rights violations and abuses such as widespread sexual violence;
- war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

### **Responsibilities:**

We will furthermore not give nor tolerate any direct or indirect support to non-state armed groups or to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

When we identify a reasonable risk that a supplier is sourcing from, or linked to, a party committing serious abuses as set forth above, we will suspend or discontinue our relation with such supplier.

We 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.

We will support efforts, or take steps to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from illegal taxation or extortion at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.



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**Supply chain suppliers:**

We request that our suppliers comply with this policy when extracting, sourcing, transporting, trading, handling or exporting minerals from conflict-affected and high-risk areas. We are willing, in accordance with our position in the supply chain, to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate risks. In case we have reasonable belief that a supplier fails to comply with this policy, we will suspend or discontinue the dubious supply.

DECEMBER 2021.

AUTHORIZED SIGNATORY

FOUAD EL OREIBI

The ARAYBY logo is shown in blue ink. To its right is a blue ink signature of Fouad El Oreibi.