

HEALTH & SAFETY POLICY

ArrowResources AG (“**ArrowResources**”) and its affiliated companies (collectively the “**Group**”) is a rapidly growing, independent, diversified commodities trading house. We are active across the metals and energy spectrum, in particular we trade: non-ferrous metals, concentrates, ores, crude oil and oil products, biofuels, natural gas, LNG and power.

We are headquartered in Switzerland but have a global presence, with offices in strategic locations around the world.

Scope

The scope of this Health & Safety Policy (“**H&S Policy**”) is to set out the objectives and rules that the Group is required to take to ensure the wellbeing of every employee, director and officer of every Group company and in every joint venture company under ArrowResources' control (each an “**Employee**” and collectively the “**Employees**”). Our suppliers, and other associated stakeholders are expected to adopt, adhere to or provide evidence of alignment with this policy for the management of health and safety.

For these purposes, a “**supplier**” is a person or entity (including partners, associated stakeholders, etc.) providing goods or services used in our operations, and such operations cover the full spectrum of production, procurement, storage, handling, transportation, testing and the purchasing of products.

Health and safety policy statements

For office-based Employees, it is the Group’s policy to provide a comfortable and ergonomic working environment and to provide healthy and safe working conditions for all of its Employees. We will not tolerate unsafe, or negative health impacts resulting from work practices that affect the health of our Employees. It is the responsibility of each department or entity manager to ensure that the above criteria are provisioned for and enforced, and that the health and safety of our people is a top priority and never compromised.

Regarding our suppliers, it is Group policy that they have recognised health and safety management systems that are compliant with international law (UN International Labour Organisation conventions) and the labour laws in the countries in which they operate. Health and safety management systems include but are not limited to: alignment with, or certification to ISO45001; pertinent and applicable standards and guidelines such as OSHA, NIOSH, IFC, the ICMM’s Good Practice Guidance etc., to ensure the health and safety of their staff and subcontractors.

Goals and objectives

Our goal is zero harm i.e. zero fatalities, serious injuries or occupational illnesses to any of our Employees or to any of our suppliers’ employees. To mitigate any ill health, injury, lost-time-injury, and fatalities, the Group will:

- identify and remove to the extent possible work-related risks for the Group’s office-based activities;
- only work with suppliers that have effective and proven health and safety management systems;
- request our suppliers to provide us with transparent and true information and data regarding their management of, and performance on, health and safety (e.g. quarterly and annual reports) if deemed necessary by any entity within the Group.
- inform our suppliers that we and/or our third-party representatives request their cooperation to conduct operational site visits to audit the effectiveness of their health and safety management systems if deemed necessary by any entity within the Group.

Training

The Group has a mandatory employee training programme in place. Tailored training courses are developed and made available via an online learning platform and in person where appropriate. Relevant employees undertake health and safety training in line with the Group’s training programme.

Policy review

We periodically review this H&S Policy with respect to its suitability and effectiveness as we strive to better improve our practices as a business and with our suppliers.

Version History

Date:	Version:	Issued by:	Description:
22.02.2021	1.0	ESG Department	Issued

This H&S Policy has been approved by the Group’s Board of Directors