



## PREFERENTIAL PROCUREMENT POLICY

### 1. Overview and Purpose

Mineral Commodities Ltd (“MRC” or “the Company”) and its Australian subsidiaries are committed to fair and equitable treatment of local and indigenous communities and support the opportunity to engage local and indigenous suppliers where practicable. MRC is also dedicated to developing a procurement strategy and adopting appropriate best practice contracting and procurement principles, policies, processes and procedures for all goods, services and works by MRC.

MRC’s contracting, purchasing and contract management activities endeavour to:

- support MRC’s corporate strategies, aims and objectives including, but not limited to, those related to sustainability, protection of the environment, and corporate social responsibility;
- achieve value for money and quality in the acquisition of goods, services and works;
- be conducted, and be seen to be conducted, in an impartial, fair and ethical manner;
- seek continual improvement including the embrace of innovative and technological initiatives such as electronic procurement processes to reduce activity cost; and
- support business in the local community.

The Company strongly encourages local and indigenous participation in tenders and quotes for the supply and delivery of goods and services to the Company, thereby investing in the communities in which the Company operates.

### 2. Policy

MRC commits to the following principles:

- adoption of a safe and culturally aware environment when engaging and/or doing business with local and indigenous suppliers;
- promotion of an open, fair, consistent, competitive, cost-effective and transparent procurement process;
- never compromising on health, safety, commercial, quality and service standards; and
- dedication of the Company’s executives and management to the essence of this policy.

### 3. Criteria for Evaluating Suppliers

MRC uses objective criteria for evaluating suppliers and awarding business. These criteria include, but are not limited to:

- commercial performance;
- administrative performance;
- price;
- delivery and cycle time;
- responsiveness;
- positive empowerment and cultural awareness;
- business management;
- quality of goods and services;
- health, safety and environment;
- adherence to conflict of interest guidelines and laws; and
- corporate governance.

Whilst MRC makes every effort to engage local and/or indigenous suppliers, the objective criteria referred to above remain a critical factor in procurement decisions.

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**4. Conflict of Interest**

Directors, stakeholders and employees of the Company and any external procurement consultants shall at all times act in compliance with the conflict of interest requirements in this Preferential Procurement Policy.

In particular, Directors, stakeholders and employees of MRC and any external procurement consultants shall:

- avoid situations in which private interests conflict, or might reasonably be thought to conflict, or have the potential to conflict, with their performed duties;
- not participate in any action or matter associated with the arrangement of a contract (i.e. evaluation, negotiation, recommendation, or approval), where that person or any member of their immediate family has a significant interest, or holds a position of influence or power, in a business tendering or quoting for MRC work;
- note that the onus is on the individual involved being alert to and promptly declaring an actual or potential conflict of interest to MRC. Any actual or potential conflict of interest identified by MRC staff and any external procurement consultants as part of any procurement process must be declared to Directors and stakeholders; and
- adhere to the Company’s Code of Conduct for Directors and Key Officers.

**5. Best Practice**

The elements of best practice applicable to developing a Procurement Strategy for MRC are:

- broad principles covering ethics, value for money, responsibilities and accountabilities;
- guidelines giving effect to those principles;
- a system of procurement authorisation limits (i.e. the authorisation of officers to approve and undertake a range of functions in the procurement process);
- procurement processes, with appropriate procedures covering minor, simple procurement to high value, more complex procurement; and
- a professional approach.

**6. Related Documents**

- MRCG-PRO-PRO-0001      Materials Management for Contractors Procedure
- MRC-GVC-POL-0009      Code of Conduct For Directors and Key Officers

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