

Annex A

INTERNATIONAL MANGANESE INSTITUTE

ANTI-TRUST POLICY STATEMENT

The International Manganese Institute (IMnI) is a global trade and technical association of producers of manganese established to promote the common interests of the producers of ore, alloys, metals and chemical forms of manganese. This statement of policy is made by IMnI on behalf of all its members.

IMnI is not intended to become involved, and under no circumstances will become involved, in the competitive business decisions of its member companies nor will it take any action which would tend to restrain or hinder competition in the industry world-wide.

For this reason, the members have taken this occasion, through this statement of policy, to make clear their unequivocal support for the policy of competition served by the anti-trust laws and international conventions relating to anti-trust issues, as well as their uncompromising intent to comply strictly with respect to all such laws and conventions.

It shall be the responsibility of every member of IMnI, to be guided by IMnI's policy of strict compliance with all applicable anti-trust laws and conventions in all IMnI's activities. It shall be the special responsibility of the IMnI Chairman, in conjunction with the Secretary General, to ensure that this policy is known and understood by all members and to seek full compliance with and adherence to it in the course of all IMnI activities, conducted under the Chairman's leadership. This policy statement will be sent to each member company and all new member companies. Each member is then responsible for ensuring that all employees having business with IMnI are aware of this policy and their responsibility to comply with its provisions.

Anti-trust compliance is the responsibility of each and every IMnI member. Any violation of this IMnI policy will result in immediate suspension from membership of IMnI of the company concerned and the question of continuing membership referred immediately by the Secretary General to the Executive Committee of IMnI for consideration and decision, which decision will be submitted to the Board of IMnI for approval (such decision on any further action to be taken may include a recommendation to the Board of IMnI that the member company be expelled from membership for such violation). Such suspension will be accompanied by the immediate removal from any IMnI office held by any official representative personally involved in such a violation.

To assist the officers, committee chairmen and members of IMnI in recognizing situations which may raise anti-trust issues, IMnI will furnish to each such person copies of the Anti-trust Policy and Procedures. Officers, committee chairmen and members having questions relating to such Policy and Procedures arising in connection with the activities of IMnI should contact the Chairman in writing via the offices of IMnI.

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Annex B

INTERNATIONAL MANGANESE INSTITUTE STATISTICAL DATA COLLECTION and COLLATION

CODE OF PRACTICE

1. All data submitted on IMnI data return forms will remain confidential to the IMnI secretariat and under no circumstances will it be passed on to any third party in a form which identifies the origin or originator of the data.
2. All data submitted on IMnI return forms will be destroyed by IMnI secretariat after it has been converted into electronic form and the originator identified by a confidential code.
3. No written or oral commentary will be provided by the IMnI secretariat on any such submitted data to any third party, including IMnI members.
4. The IMnI secretariat will not answer to any questions or enquiries from members regarding the data submitted by any member other than to such questions as are asked by a specific member regarding their own return and only with a view to rectifying errors or correcting omissions on submitted data return forms.
5. All data returns will be held in electronic form on a dedicated disc which will be accessible only to accredited staff members of the IMnI secretariat. The data will only be handled on IMnI computers by IMnI staff members. One back-up copy of such data will be made and retained in a safe place. No copies of this information in any electronic form whatsoever will be passed to any third party including members of IMnI by IMnI staff members.
6. The output reports will be made available to members who have contributed to the compilation of the data-base by submitting completed data return forms.
7. It is the responsibility of the IMnI Secretary General to ensure that this code of practice is sent to all members and is complied with and enforced to the letter.
8. No oral or written commentary on the output reports will be made by the IMnI secretariat before at least one year has elapsed from the date of compilation of any one data set.
9. The data collection and collation project specifically excludes any and all price information on products mined, manufactured and sold by members of IMnI being communicated to members via the data compilation service. This ensures compliance with the IMnI anti-trust/competition policy statement which binds all IMnI members.