

Conflict Minerals Policy

MTALX was founded on the principles of fairness and respect to all. This carries through to all employees, customers and to our suppliers around the world. MTALX is a supplier of metals and minerals to the Steel and Aluminium industries. Recently it has branched out into the Super Alloy and electronic sector, which includes minerals sourced from African and South American countries.

MTALX is committed to complying with the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**. Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (CAHRA), and recognising that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

We support all due diligence, traceability, risk recognition and mitigation methods to comply with the [US Dodd Frank conflict minerals law 1502](#) and to the [EU Minerals Due Diligence regulation 2017](#) and to support all our customers with the [Responsible Minerals assurance process \(RMAP\)](#)

We commit to following the OECD model supply chain policy Annex II as laid out below:

1) Serious abuses associated with the extraction, transport or trade of minerals:

While sourcing from, or operating in, conflict-affected and high-risk areas (CAHRA), we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the order by any party of:

- i) any forms of torture, cruel, inhuman and degrading treatment;
- ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which the person has not offered himself voluntarily;
- iii) the worst forms of child labour;
- iv) other gross human rights violation and abuses such as widespread sexual violence;
- v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

2) Risk management of serious abuses:

As per our MTALX Management due diligence programme (see separate document) we will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses.

3) Direct or indirect support to non-state armed groups:

We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Nor procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who;

- i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii) illegally tax or extort money or minerals at points of access to mine sites, along transport routes or at points where minerals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

As per our MTALX Management due diligence programme (see separate document) We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

4) Direct or indirect support to public or private security forces:

We agree to eliminate, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; or illegally tax or extort intermediaries, export companies or international traders.

We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

5) Bribery and fraudulent misrepresentation of the origin of minerals:

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.

6) Money laundering:

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 or money derived from the illegal taxation or extortion of minerals along the supply chain, we will immediately suspend or disengage from the supplier.

7) Non-payment of taxes and royalties due to governments:

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from CAHRA regions are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

To summarize; in accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impact through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Whistle-blowing policy:

For full details, please refer to the MTALX General Whistleblowing Policy document. Whistle blowers can get in contact with the senior managers at our company by:

Email: whistleblower@mtalx.com

Phone: The Due diligence manager on 020 7101 2432

The Chief Executive on 020 7101 2444

Address for correspondence is: MTALX Limited, 132 Brent Street, London, NW4 2DR