

MTALX management Due diligence programme for CAHRA

This document serves as a guide and a reference for all staff, agents, business support networks and management of MTALX Ltd. Below are the steps that should be taken in relation to all business dealings from any CAHRA (conflicted affected and high-risk areas) around the world. With particular focus on Central Africa.

Responsible CAHRA Due diligence officers:

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Due Diligence officer, Rwanda: Mr Tobias Rothe – email: tobias@mtalx.com

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Documentary procedures:

1. All staff, agents, business support network operatives and management should carefully read through the MTALX Conflict Minerals Policy and sign their acceptance of it.
2. All paperwork relating to contracts done in CAHRA areas must include complete and diligent traceability and due diligence information from mine to smelter, whether that is in house or through an industry approved scheme or both.
3. Traceability and due diligence information will either be collected via an industry approved scheme and/or via inhouse means.
4. All contracts for materials originating in CAHRA regions will include the below declaration and must be understood and accepted by means of a signature by the supplier:
“We the undersigned confirm that the source of these minerals is legal, has not contributed to conflict in any form, nor to the use of the worst forms or child labour. That no persons have been coerced into forced labour to produce them and that all legal taxes and duties have been paid to the appropriate authorities. We have received, read, and accepted the MTALX conflict minerals policy and agree to abide by it. In addition, the buyer has the right to make unannounced spot checks on the supplier’s yard or mine/mines of origin and have access to the supplier’s paperwork.”
5. All documents and correspondence created in the negotiation and execution of a purchase of minerals from a CAHRA region, must be logged and kept together for future audit purposes.

Risk identification procedures:

1. For all offers of minerals from CAHRA regions, the mine origin of the material must be identified, whether through an industry programme, in house means or both.
2. Once the mine origin of the material has been identified, a check via industry programmes, UN publication, NGO reports or via local actors must be made to ensure that the mine of origin in question, does not appear on any sanction list, nor does it appear or have any allegations against it in any other reports. Also, that the transport route used for the material does not have any incidents related to it or has not been cited in any reports.
3. Once proper checks have been made and if all the criteria of our Conflict Minerals Policy have been satisfied, then the purchase should be carried out as per the documentary procedure above.

Risk recognition and mitigation measures:

If a risk at the mine site or along the transport route is identified, the nature of the risk should immediately be established, logged and the industry body, or local government agencies should be informed. Depending on the type of risk that is identified, the commensurate mitigation measure will be applied. There are 3 levels of risk, Red, Amber and Green.

- **Red level risks: Risk of supporting or financing non-state armed groups, at the mine site or along the transport routes:** Immediate disengagement should be carried out and the industry programme and local or national governments should be alerted. Further investigation should be carried out to confirm or deny such a risk.
- **Amber level risks: Risk of the worst forms of child labour, sexual violence, private security interference, bribery and corruption and money laundering:** Immediate suspension of business with the company or companies involved. An email / letter should be sent immediately to the company in question to ask for their response to the allegations made about these risks. Depending on the response given by the company and whether the answer is satisfactory or whether they agree to adopt mitigation measures. Then a timescale of 1 month will be given initially, followed by a further 2 months if mitigation measures are not possible within 1 month. After 3 months, either the risks will have been satisfactorily mitigated, in which case business may resume, or a further 1-month mitigation period will be granted. If there is still no improvement, then we will disengage with the company in questions and reports submitted to the industry scheme and local or national governments.
- **Green level risks: Risk of unusual or inflated production from a mine site or non-payment of government fees or duties:** Business may continue, but an email /letter should immediately be sent to the company asking them to explain the unusual or inflated production from one or other of the mine sites they procure from. Similarly, a request for explanation of the non-payment of government fees or duties. Depending on the response given by the company, we either give them a 1- or 3-months mitigation period, after which they must have remedied the situation, or we reserve the right to take further action. If we are stratified with their response, we continue business as normal.

For all 3 levels above, the industry programme should be informed as well as local and/or national governments.

Whistleblowing as a tool for risk recognition:

Whistleblowing can be an important tool for information gathering and for risk identification. Please see below the contact methods available to whistleblowers.

For further details, please refer to the MTALX General Whistleblowing Policy document. Whistleblowers 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

Regular company CAHRA audits:

We are happy to be audited on a regular basis to monitor and evaluate our traceability and due diligence measures.

Annual Step 5 public reporting:

We will adhere to our annual (OECD) Step 5 public reporting responsibilities.

Any questions regarding the above, please contact Ms Candida Owens through the details listed at the top of this document.