

Responsible Minerals Sourcing Policy

This policy is valid for the Metallo group, consisting of Metallo Belgium in Beerse and Metallo Spain in Berango. Metallo is the global reference when it comes to recycling of secondary raw materials containing tin combined with other base metals. The Metallo Group focuses mainly on processing multi-metallic raw materials that are generated as scrap or residual waste during manufacturing processes. The raw material feed to Metallo equally comes from either recycled or scrap sources which are reclaimed end-user or post-consumer products, or recycled metal from excess, obsolete, defective and scrap metal materials that contain refined or processed metals that are appropriate to recycle for the production of tin, copper, lead or nickel. As such Metallo is involved in above-ground or “urban mining” rather than underground mining.

Referring to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals, Metallo has no industrial, mining or trading operations in Conflict-Affected and High-Risk Areas (CAHRAs), however Metallo understands the seriousness of the possibility that Tin minerals or metals purchased in the course of its activities may in certain cases originate from such areas.

Also, we understand that profits from Tin mining in such conflict-affected areas may support direct or indirect to non-state, illegal armed groups and may be encouraging certain unfair labor practices or other human rights violations.

With this policy we aim at preventing or mitigating all risks mentioned in the Annex II of the guidance and listed below:

Regarding serious abuses associated with the extraction, transport or trade of minerals:

While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission 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 said person has not offered himself voluntarily;
- iii. the worst forms of child labour;
- iv. other gross human rights violations and abuses such as widespread sexual violence;
- v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding 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. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, 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 transportation routes or at points where minerals are traded; and/or
- iii. illegally tax or extort intermediaries, export companies or international traders.

Regarding public or private security forces:

We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; 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.

Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Regarding 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.

Regarding 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 derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas 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).

Regarding risk management, when we identify any of all the aforementioned risks, we will, in accordance with our position in the supply chain, engage with suppliers, relevant authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate these risks within the supply chain. And we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation for any of these risks defined above.

We are committed to ensuring that minerals from CAHRAs do not enter into Metallo's supply chain, according to the EU Minerals Law, regulation EU 2017/821, which has come into force at January 1, 2021, and by adopting this policy, our Code of Conduct and by use of Due Diligence measures based on the current OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs and our own KYC procedure. We promote risk awareness towards our valued suppliers and we request that our suppliers comply with this policy when extracting, sourcing, transporting, trading, handling or exporting minerals from CAHRAs.

Metallo participates in the Responsible Minerals Initiative (former Conflict Free Sourcing Initiative) and has implemented the Responsible Minerals Assurance Process Tin and Tantalum Standard to identify CAHRAs and assess its risks and to remain it's Conformant Smelter Status.

Metallo also holds membership of the International Tin Research Association (ITA) which has recognized the necessity to work with all stakeholders concerned on all levels to manage risk in conflict and high risk affected areas. We fully support the aims of iTSCi (ITA Tin Supply Chain Initiative) due diligence system that has been successfully rolled-out in DRC and adjoining countries.

Any interested party may voice concerns regarding the circumstances of mineral extraction, trade , handling and export in view of the "TIN Standard" , Responsible Minerals Assurance Process" by contacting us through conflictreesourcing@metallo.com.

Metallo Group (Metallo Belgium and Metallo Spain)
May 2021