



PR-R-413 – Due diligence

## PHOENIX METAL LTD - Conflict Minerals Sourcing Policy

Columbite-tantalite (coltan), cassiterite, wolframite and gold, or their derivatives, including tantalum, tin, and tungsten, originating from the Democratic Republic of the Congo (DRC) and adjoining countries are sometimes mined and sold by armed groups to finance unfair labor practices or human rights violations. Some of these minerals and/or derivatives can make their way into the supply chains of the products used around the world. It is the policy of PHOENIX METAL LTD to avoid [conflict mineral(s)] that directly or indirectly finance or benefit armed groups from conflict-affected regions.

As part of PHOENIX METAL LTD's commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is Phoenix Metal's goal to seek to only procure raw materials containing cassiterite/tin, columbite-tantalite, wolframite that does not support conflict.

In support of this sourcing policy, PHOENIX METAL LTD will

- i. Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and encourage our suppliers to do likewise with their suppliers
- ii. Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm the mineral in our supply-chain does not support conflict.
- iii. Immediately discontinue engagement with suppliers who pose a reasonable risk to be supporting conflict.
- iv. Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders and the public (as required).

Phoenix Metal Ltd is a member of the ITSCI program.

