

Conflict-Free Minerals Policy

BELAIR AFRICAN METALS sarl strictly adheres to the OECD (Organisation for the Economic Cooperation and Development) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High- Risk Areas.

We also abide by the principles, guidelines, standards and regulations set forth in:

- US Dodd-Frank Wall Street Reform and Consumer Protection Act (Section 1502)
- United Nations (UN) Security Council Resolutions that are relevant
- The Mineral Certification Scheme of the International Conference on the Great Lakes Region
- DRC National Certification Initiative
- DRC Mining Code (2002) and its ancillary Mining Regulation (2003)
- Certified Trading Chains (CTC) programme
- Conflict-Free Tin Initiative (CFTI)
- Extractive Industries Transparency Initiative (EITI)

We currently source our minerals from the Democratic Republic of Congo (DRC) only and recognise that we have a responsibility to respect Human Rights and to not contribute to conflict. We commit to adopt, widely distribute and incorporate into our agreements with our suppliers and partners, the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas.

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

We do not tolerate, contribute to either financially or physically, nor do we profit from:

- Any forms of Human Rights abuses, from the lowest forms to the highest forms of torture or human violation.
- Any form of forced or compulsory labour.
- The worst forms of child labour (as defined by ILO Convention No. 182).
- Gender-based human rights violations, such as sexual violence.
- War crimes or crimes against humanity, including Genocide.

Regarding risk management of serious abuses:

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a proven risk that they are sourcing from, or linked to, any party committing serious abuses as outlined above.

Regarding direct or indirect support to non-state armed groups:

We do not tolerate direct or indirect support to non-state armed groups, through the extraction, transport, or any aspects of trade of minerals.

- Where they illegally control mine sites or otherwise control transportation routes.
- Where they control mineral trading hubs or the upstream suppliers.
- Where they illegally tax or extort monies or minerals directly at the mine sites, along the transportation routes or at the trading hubs.
- Where they tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to non-state armed groups:

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.

Regarding public or private security forces:

- We do not condone or engage with direct or indirect support to public or private security forces that illegally control mine sites, transportation routes or upstream actors in the supply chain who illegally tax or extort money or minerals at the mine sites, along transportation routes or at trading hubs or who illegally tax or extort intermediaries, export companies or international traders.
- The role of private or public security forces at the mine site and surrounding areas, along the transportation routes and at trading hubs should be to maintain the rule of law. These security forces should only be present to provide security to the mine, its workers, including safe guarding human rights, to the mine equipment and facilities and to the transport routes. To ensure legitimate extraction and trade.
- The forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. We will adopt screening policies to ensure that where individuals, units or companies are known to have been responsible for gross human rights abuses, such individuals or companies will not be hired.
- We support all initiatives to improve the transparency, proportionality and accountability for the improvement of payments made to public security forces.
- We support all initiatives to avoid or minimise the exposure of vulnerable groups, especially, artisanal miners, to adverse impacts related to the presence of public or private security forces at mine sites.

Regarding risk mitigation of public or private security forces:

We have devised and implemented a risk mitigation plan with our upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private

security forces. Where we identify that such a reasonable risk exists or any other risks described above, we will suspend or discontinue engagement with such upstream suppliers if after a period of 6 months from identification mitigation attempts have failed.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

We will not demand or offer any bribes for whatever reason, including to hide the origin of our minerals or to falsely hide any taxes or fees owed to governments, in either trading, exporting or transporting minerals.

Regarding money laundering:

We do not condone money laundering and take every precaution to ensure that we do not allow money laundering, which might occur during the extraction, trade, transport or export of minerals, to hide illegal taxation or extortion of minerals at mines sites or along the transportation routes.

Regarding payments of taxes, fees and royalties due to governments:

We will ensure that all the 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).