



## **METALLIC RESOURCES, INC.**

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### **Responsible Sourcing Policy**

Metallic Resources is aware of and actively supports the international efforts to investigate, monitor and mitigate activities that contribute to illegal armed groups, human rights violations, or financial wrongdoings in Tin supply chains as defined in Annex II of the Organization of Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas Third Edition (OECD Guidance).

Metallic Resources respects the dignity and importance of human rights and considers any mineral that may pose risks of contributing the harm listed in Annex II of OECD Guidelines to be conflict minerals. Metallic Resources will only purchase Tin-containing materials from sources that have been verified as not involving or contributing to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of the OECD Guidance specifically:

- Serious abuses associated with the extraction, transport or trade of minerals:
  - Any forms of torture, cruel, inhuman, and degrading treatment.
  - Any forms of forced or compulsory labor.
  - The worst forms of child labor,
  - Other gross human rights violations and abuses such as widespread sexual violence
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Direct or indirect support to non-state armed groups
- Direct or indirect support to public or private security forces
- Bribery and fraudulent misrepresentation of the origin of minerals
  - Money laundering
  - Nonpayment of taxes, fees, and royalties to government

In support of the above, all relevant Metallic Resources staff members are directed to follow and be trained on procedures to implement a conflict minerals due diligence system that aims to:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence and the Responsible Business Alliance's Responsible Minerals Assurance Process (RMAP) and encourage our suppliers to do the same.
- Provide and expect our suppliers to cooperate in providing, due diligence information to confirm tin containing material in our supply chain does not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of OECD Guidance.
- Immediately discontinue engagement with suppliers who pose a reasonable risk to be supporting conflict.
- Metallic Resources undergoes an annual RMAP assessment to examine whether Metallic Resources has implemented a due diligence management system that supports responsible mineral procurement per the OECD Guidance.

- Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders (as requested).

Any concerns about our policy or due diligence system should be reported to Responsible Minerals Initiative through its grievance mechanism.

Sincerely,

Stanley Rothschild  
Metallic Resources, Inc.  
President