

Responsible Minerals Due Diligence Management Undertaking

Recognizing the risk of significant adverse effects from the extraction, trading, processing and export of mineral resources in conflict-affected and high-risk areas, and perceiving the obligation to respect human rights, not to fuel conflict and not to have negative environmental and social impacts, we commit ourselves to adopting and widely disseminating a policy on responsible sourcing of minerals from conflict-affected and high-risk areas and incorporating the policy into agreements to be entered into with suppliers. This policy provides a reference for conflict-sensitive sourcing activities throughout mineral resource supply chain and for suppliers' risk awareness. We commit to abiding by the relevant UN sanctions resolutions, abide by applicable domestic laws implementing such resolutions, and refrain from engaging in any act that may aid or facilitate the conflict.

To this end, we are committed to identifying and avoiding the following risks in our business activities:

A. Serious infringement related to extraction, transportation or trading of minerals

In course of procurement or operation in "conflict-affected and high-risk areas", we will neither tolerate nor in any way profit from, help or facilitate any of the following acts by any party:

Any form of torture, cruel, inhuman and humiliating treatment;

Any form of forced or compulsory labour (all work or service which is exacted from any person through coercive and exploitative practices under the menace of penalty and for which the said person has not offered themselves voluntarily.);

The worst forms of child labour or any other situation of child Labour;

Other serious violations and abuses of human rights, such as widespread sexual violence;

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Strategy to mitigate risks

When we have reasonable grounds to believe that there is a risk that an upstream supplier is sourcing from or is associated with any of the parties that have committed the serious infringement described above, we will immediately suspend or terminate the cooperation with that supplier.

B. About "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, transportation, trading, handling or export of minerals. Such support 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.

These armed groups or their affiliates may have committed the following violations:

Illegally controlling mine sites or otherwise controlling transportation routes, mineral trading points, and upstream actors in the supply chain; and/or

Illegally taxing or extorting money or minerals at the entrance to a mine site, along a transport route or at a point of exchange for minerals; and/or

Illegally taxing or extorting intermediaries, export companies or international traders.

Strategy to mitigate risks

When we have reasonable grounds to believe that an upstream supplier is sourcing from or is associated with any of the parties that provide direct or indirect support to non-state armed group, we will immediately suspend or terminate the cooperation with that supplier.

C. About public or private security forces

We disagree to provide direct or indirect support to public or private security forces that illegally control mine sites, transport routes and upstream actors in the supply chain, illegally collect taxes or extort money or minerals at the entrance to mine sites, along transport routes or at mineral trading points, or illegally tax or extort money from middlemen, exporters or international traders.

We acknowledge that the role of public or private security forces at mine sites and/or their surrounding areas and/or along transport roads is solely to uphold the rule of law, including the protection of human rights, the protection of miners, equipment and facilities, and the protection of mine sites or transport routes so that legitimate mining and trade are not interfered with.

In the event that we or any company in our supply chain contracts with public or private security forces, we undertake or will require that such security forces be recognized by established international standards and guidance documents dealing with public or private security forces. In particular, we will support or take measures to use screening policies to ensure that individuals or security armed units known to have committed human rights violations are not recruited.

We will support or take steps to work with central or local governments, international organizations and civil society organizations to find practical solutions to improve transparency, proportionality and accountability of armed security costs for public safety.

We will support or take measures to interact with local governments, international

organizations and civil society organizations to avoid or minimize the negative impact of the presence of public or private security forces at mine sites on vulnerable groups, in particular artisan miners.

Strategy to mitigate risks

When we identify some degree of such risk, we will immediately develop, adopt and implement upstream supplier and other stakeholder risk management plans based on the company's specific position in the supply chain so that the risk of providing direct or indirect support to public or private security forces is contained or reduced. When the risk management plan does not work for six months, we will temporarily suspend or terminate our cooperation with upstream suppliers.

D. About fraudulent misrepresentations about bribery and the origin of minerals

We will not offer, promise, provide or demand any bribes and will resist the temptation to offer bribes in order to conceal or falsify the origin of minerals and to misstate taxes, fees and royalties payable to governments for mining, trading, processing, transportation and export of minerals.

About money laundering

When we have reason to believe that there is a risk of money laundering arising from, or associated with, the extraction, trading, handling, transportation or export of minerals derived from illegal taxation or extortion at the entrance to the mine site, along the transport route, or where the minerals are traded by upstream suppliers, we will support or take measures that contribute to the effective elimination of money laundering.

About taxes, fees and royalties paid to government

We will ensure that all legal taxes, fees and royalties related to the mining, trading and export of minerals from conflict-affected and high-risk areas are paid to governments, and commit to disclosing such payments in accordance with the mine country's requirements for disclosure of taxes and fees paid to government authorities, based on the company's location in the supply chain.

Strategy to mitigate risks

We undertake to cooperate with suppliers, central or local governments, international organizations, civil society and the affected third parties, as appropriate, in accordance with the specific position of the enterprise in the supply chain, and to improve or track performance for the purpose of taking measurable actions within a reasonable time span to prevent or reduce adverse impact risks. When risk reduction measures do not work, we will suspend or discontinue cooperation with upstream suppliers. Enterprises should conduct additional risk assessments for the risks that need to be reduced after adopting a risk management plan. When no apparent result was achieved six months after taking risk management plan, the risks of offering bribe, bribery, fraudulent misrepresentation of

mineral areas, money laundering, and payment of taxes, fees and royalties to the government cannot be prevented or reduced, the enterprise shall temporarily stop or discontinue cooperation with suppliers for at least three months. The risk management plan shall be revised while the cooperation is temporarily suspended, and the performance objectives to be achieved before the resumption of trade relations shall be set out.

E. About Occupational health and safety

In carrying out the production of procured goods, we will not benefit from, assist, facilitate or procure from or be associated with any party that provides a life-threatening occupational environment for its direct and/or indirect employees and/or any person at its production site

Strategy to mitigate risks

When we have reasonable grounds to believe that an upstream supplier provides a life-threatening occupational environment, or procured from or is associated with any party that does have such circumstance, we will immediately suspend or terminate the cooperation with that supplier.