

## **Responsible Minerals Due Diligence Report – 2025**

Company: Conecsus LLC

Date: November 14, 2025

### **1. Company Information**

Conecsus is a recycler of materials containing tin, lead, and antimony for processing into pure tin, tin alloys, and tin lead and lead alloys.

The raw materials purchased by Conecsus are classified as scrap and recycled materials per RMI's definition of "secondary material". All material is purchased from North America (United States, Canada, and Mexico) and have been determined to be low risk suppliers.

The company began operations in 1996 and changed company name to Conecsus in 2012. Conecsus has one smelting facility located at 106 Tejas Drive in Terrell Texas and the company's identification number is CID003504.

Time period covered by this report: 11/1/2024 to 11/14/2025

### **2. Assessment Summary**

Conecsus has applied to become a member of the Responsible Mineral Initiative. The company has an assessment scheduled for December 2025. Upon completion, the assessment summary report will be posted on the company website: <https://conecsusllc.com>.

### **3. Company Supply Chain Policy**

Conecsus adopted and published a Responsible Sourcing Policy consistent with the third edition OECD Due Diligence Guidance and RMI standards. Conecsus is aware of, actively supports, and is committed to international efforts to investigate, monitor, and mitigate activities that contribute to illegal armed groups, human rights violations, or financial wrongdoings in Tin supply chains. Conecsus is committed to addressing any risks identified. The policy was reviewed and approved by senior management and is communicated to all relevant stakeholders (suppliers, customers, employees, etc.). It will be available on our company website.

The due diligence management system is conducted yearly, presented at the Management Review, and implemented by the Compliance Officer.

### **4. Company Management System**

#### **4.1. Management Structure**

Conecsus is committed in its support to supply chain due diligence and has established strong management systems and an internal procedure for due diligence. Conecsus has assigned a Compliance Officer and a Supply Chain Manager to oversee the due diligence program and risk management in conjunction with Conecsus' Operations Director.

The Compliance Officer is responsible for overseeing the implementation of the due diligence program. Conecsus' Plant Director and Compliance Officer coordinate with the relevant departments and personnel (purchasing, production, shipping and receiving, etc.) to ensure each department follows up on their roles and responsibilities to implement the due diligence program and reports any red flags and potential risks identified.

Conecsus conducts due diligence management system training every two years for key staff from all relevant departments. All new hires receive training during initial new hire training. In the event of an update to the program, additional training will be conducted as necessary.

The management and staff of Conecsus have committed themselves to comply with the relevant principles of the Supply Chain Policy and make conscious decisions about responsibly sourced minerals.

## **4.2. Internal Systems of Control**

Conecsus has established and updated its due diligence management system to be aligned with the OECD Guidance and the Responsible Minerals Assurance Process. We are currently implementing said processes.

In regards to Tin, Conecsus only purchases scrap and recycled materials per RMI's definition of "secondary material". We have communicated the supply chain policy to all identified upstream suppliers and all material is being reviewed upon receiving. Any material found to be a risk will be returned to the customer.

We have established a grievance mechanism to collect information from interested parties concerning grievances. Any issue can be addressed to [grievance@conecsusllc.com](mailto:grievance@conecsusllc.com). The Compliance Officer is responsible for investigating complaints. If the complaint is determined to be justified, the Compliance Officer will present findings to the Operations Director and initiate appropriate actions. Conecsus strives to provide a satisfying and productive work environment based on open communication. All grievances will be fully documented and employee wishes will be considered in determining the appropriate steps and actions.

## **4.3. Record Keeping System**

Conecsus requires that all records relating to the due diligence program be maintained for at least five years and that they are properly used and safely stored in the online company database.

## **5. Risk Identification**

Conecsus has established a procedure to identify conflict affected and high risk areas (CAHRAs) to identify sourcing risks. The materials purchased by Conecsus are secondary materials, material commonly referred to as recycle or scrap material. Metals reasonably assumed to be recycled are excluded from the scope of OECD due diligence. The company has submitted supplier due diligence questionnaires to all upstream suppliers as the initial step in our Know Your Counterparty (KYC) process. The KYC process allows Conecsus to:

- Identify all suppliers of tin material,
- Determine the identity and type of business relationship for the tin supplier,
- Determine the legality of business operations for each tin supplier
- Determine business type and beneficial ownership

- Determine transportation route
- Determine potential risks

The risk identification process relies on the gathered information to determine risk level and identify CAHRAs. Resources considered when Identifying CAHRAs include:

- U.S Dodd-Frank Act
- European Union Regulation 2017/821 CAHRA List
- Heidelberg Conflict Barometer
- Fragile State Index
- Worldwide Governance Indicators
- Global Peace Index

## **5. Supply Chain Review / Risk Mitigation**

The Compliance Officer reviews each KYC questionnaire and evaluates against the resources listed above to determine the risk level of each supplier.

Conecsus is still in the process of obtaining all initial KYC documentation and conducting supply chain evaluations. Conecsus only sources low risk secondary material eliminating the need to perform enhanced due diligence or transit route mapping. Neither the material type nor the geographical areas are expected to trigger any red flags. Should any high-risk transactions be detected, Conecsus will activate a risk mitigation strategy. This may involve continued engagement or temporary suspension with the supplier during risk management, or discontinued engagement where mitigation appears unacceptable.

## **6. Conclusion**

Conecsus is committed to continuous improvement in responsible sourcing. This Due Diligence Report demonstrates alignment with OECD Guidance and RMI RMAP requirements, ensuring that our operations contribute to ethical and conflict-free supply chains.