

## Responsible Sourcing Policy

As a secondary smelter and recycler, Conecsus LLC actively supports and is committed to ensuring that all minerals processed in our facilities are sourced responsibly and in a manner that supports ethical, sustainable, and conflict-free supply chains. This policy aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition (OECD Guidance) and the Responsible Minerals Initiative (RMI) standards, including the Responsible Minerals Assurance Process (RMAP) and applies to all minerals processed by Conecsus, including but not limited to Tin, Lead, and Antimony, as well as all recycled and scrap inputs, suppliers, and facilities.

Conecsus is voluntarily seeking participation in RMI/RMAP in order to demonstrate our commitment to avoiding or contributing to risks in the mineral supply chains. Consequentially, it does not source from any area identified as high (red) based on information gathered from credible systems. All material is sourced exclusively from North America (United States, Canada, and Mexico) and is classified as scrap and recycled materials per RMI's definition of "secondary material". Conecsus primarily purchases materials from reputable suppliers with whom a long relationship has been established. Adequate due diligence has been carried out with all customers with the implementation of a "know your counterparty" (KYC) process. The metals and products produced by Conecsus are derived from responsible sources and we have not identified any links with Conflict-Affected and High-Risk Areas (CAHRA's). In the event risks are identified, Conecsus will immediately implement mitigation measures or disengagement. Conecsus will actively participate in RMAP audits and provide transparent data to comply with RMI standards.

In support of the above and OECD Guidance Conecsus will:

- Conduct due diligence consistent with OECD Guidance to identify and mitigate risks and encourage our suppliers to do the same.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to minimize any risks in the supply chain that might contribute to:
  - Support to illegal armed groups
  - Direct or indirect support to public or private security forces who illegally control mine sites (direct or indirect support" does not refer to legally required forms of support, including legal taxes, fees and/or royalties that companies pay to the government of a country in which they operate)
  - 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
  - Bribery and fraudulent misrepresentation of the origin of minerals
  - Money laundering
  - Non-payment of taxes, fees and royalties to governments

- Share relevant supply chain due diligence information with customers and stakeholders, as appropriate.
- Publish annual reports summarizing our responsible sourcing practices.
- Share relevant supply chain due diligence information with customers and stakeholders, as appropriate.
- Train and direct all relevant staff members on procedures related to responsible sourcing.

**By supplying Conecsus with Tin, Lead, or Antimony containing material, you and your company explicitly agree to the terms of this Responsible Sourcing Policy. In the event that you and your company do not agree to the terms of this Responsible Sourcing Policy Conecsus will no longer source material from you and your company.**

Conecsus recognizes that responsible sourcing is a continual process and will regularly review and update this policy to reflect evolving best practices as well as engage with industry peers, RMI, civil society, and governments to improve due diligence. This policy is approved by the Executive Management of Conecsus and overseen by the Compliance and Sustainability Team. All employees, suppliers, and partners are expected to uphold these standards.

Any concerns about our policy or due diligence system should be reported through our grievance mechanism [grievance@conecsusllc.com](mailto:grievance@conecsusllc.com).

Scott Lehew, Operations Director  
Conecsus LLC  
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