



Conflict Minerals Policy for MRI Trading AG

Introduction:

MRI Trading AG ("MRI") is a leader in trading, metals and minerals, petroleum products, bulk and freight. Built upon detailed market intelligence, over 15 years of success, MRI's aim is to continue to grow with the same integrity that laid its foundation.

At MRI, corporate and social responsibility is woven into our everyday business practices. As our company thrives based upon the importance of its people, so do we value and respect the planet on which we live. We have made a commitment to our employees and our customers alike to continue to run our company with the health of our environment in mind.

This policy is in response to the current legislation, compliance and company due diligence requirements relevant and necessary to the sourcing of the minerals in or from conflict and high-risk areas. As described and advised within the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict affected and High-Risk Areas document, second edition November 2012, we have opted to adopt the model policy to form part of our policy at MRI.

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Regarding the mitigation of contracting with suppliers that do not comply with MRI's Conflict Minerals Policy

1. Communication
 - i) MRI, and its affiliates, communicates to its clients, suppliers and to the public through the MRI website on our Corporate Responsibility and that it adheres to the conflict minerals sourcing policy and recommendations of the OECD
 - ii) MRI, and its affiliates, conducts due diligence on its:
 1. Suppliers
 2. Origination of minerals
 3. Supply chain
 1. Logistics
 2. Comptoir (Where applicable)
 3. Negotiant (Where applicable)
 4. Receivers
2. Due Diligence
 - i) KYC (Know Your Customer): MRI, and its affiliates, firstly endeavour to find out the history and business structure of its suppliers
 - ii) All suppliers to be approved by ITSCi. All material will be able to be traced by the mine tags or equivalent, listing:
 1. Mine name
 2. Ownership
 3. Middle men
 4. Comptoir (Where applicable)
 - iii) Regular meetings with suppliers and site visits
 - iv) Regular information on suppliers supply chain
3. Reporting
 - i) MRI, and its affiliates, will store documents from its suppliers consistent with the requirements of the CFSI and the ITSCi program.

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

1. While sourcing from, or operating in, conflict-affected and high-risk areas, MRI will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
 - i) any forms of torture, cruel, inhuman and degrading treatment;
 - ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
 - iii) the worst forms of child labour;
 - iv) other gross human rights violations and abuses such as widespread sexual violence;
 - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management of serious abuses:

2. MRI will immediately suspend or discontinue engagement with upstream suppliers where MRI identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

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

3. MRI will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals 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 who:

- i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

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

4. MRI will immediately suspend or discontinue engagement with upstream suppliers where MRI identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

Regarding public or private security forces:

5. MRI agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

6. MRI recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. Where MRI or any company in our supply chain contract public or private security forces, MRI commit to or MRI will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, MRI will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. MRI will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. MRI will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners

Regarding risk management of public or private security forces:

10. In accordance with the specific position of the company in the supply chain, MRI will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where MRI identify that such a reasonable risk exists. In such cases, MRI will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where MRI identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, MRI will respond in the same vein.

Regarding bribery and fraudulent misrepresentation of the origin of minerals:

11. MRI will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Regarding money laundering:

12. MRI will support efforts, or take steps, to contribute to the effective elimination of money laundering where MRI identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

Regarding the payment of taxes, fees and royalties due to governments:

13. MRI will ensure that all 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, MRI commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:

14. In accordance with the specific position of the company in the supply chain, MRI commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. MRI will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.¹⁰