



CONFLICT MINERALS POLICY

JANUARY 2024

Revision History

VERSION	REVISION DATE	SECTION REVISED	REASON FOR REVISION	DESCRIPTION OF REVISION

WOODCROSS RESOURCES HOLDCO LTD**Registered number: 000006593****("Company")****Conflict Minerals Policy****1. PURPOSE**

- 1.1 Woodcross Resources Holdco Ltd (hereinafter referred to as the *Company*), its subsidiaries (together with the Company, the *Group*) and each of their employees are committed to maintaining a high standard of integrity, investor confidence and good corporate governance.
- 1.2 This Conflict Minerals Policy (*Policy*) forms part of the Group's risk management framework and outlines the Group's requirements regarding the management of its minerals supply chain.
- 1.3 This Policy was prepared with reference to Annex 2 of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the *OECD Guidance*).

2. INTRODUCTION

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

3. SERIOUS ABUSES ASSOCIATED WITH THE EXTRACTION, TRANSPORT OR TRADE OF MINERALS

While sourcing from, or operating in, conflict-affected and high-risk areas, each member of the Group will neither tolerate nor by any means profit from, contribute to, assist with

or facilitate the commission by any party of:

- 3.1 any forms of torture, cruel, inhuman and degrading treatment;
- 3.2 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;
- 3.3 any form of child labour;
- 3.4 other gross human rights violations and abuses such as widespread sexual violence; and
- 3.5 war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide,

(together, *Serious Abuses*).

4. RISK MANAGEMENT OF SERIOUS ABUSES

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing Serious Abuses.

5. DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS

The Group will not tolerate any direct or indirect support to non-state armed groups, designated as such by the UN Security Council and any other relevant authorities (*Non-State Armed Groups*), or their affiliates through the extraction, transport, trade, handling or export of minerals.

For the purpose of this paragraph:

“**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.

“**Affiliates**” includes négociants, consolidators, intermediaries, and others in the supply chain that work directly with Non-State Armed Groups to facilitate the extraction, trade or handling of minerals.

“**Control**” of mines, transportation routes, points where minerals are traded and upstream actors in the supply chain means:

- i) overseeing extraction, including by granting access to mine sites and/or coordinating downstream sales to intermediaries, export companies or international traders;
- ii) making recourse to any forms of forced or compulsory labour to mine, transport, trade or sell minerals; or
- iii) acting as a director or officer of, or holding beneficial or other ownership interests in, upstream companies or mines.

“**Extort**” from mines, transportation routes, points where minerals are traded or upstream companies means the demanding, under the threat of violence or any other penalty, and for which the person has not voluntarily offered, sums of money or minerals, often in return for granting access to exploit the mine site, access transportation routes, or to transport, purchase, or sell minerals.

6. RISK MANAGEMENT OF DIRECT OR INDIRECT SUPPORT TO NON-STATE ARMED GROUPS

Each member of the Group will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to Non-State Armed Groups or their affiliates.

7. PUBLIC OR PRIVATE SECURITY FORCES

7.1 The Group agrees to eliminate 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.

7.2 The Group recognises 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.

- 7.3 Where any member of the Group or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, the Group 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.
- 7.4 Each member of the Group 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.
- 7.5 The Group 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 where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

8. RISK MANAGEMENT OF PUBLIC OR PRIVATE SECURITY FORCES

In accordance with the specific position of a member of the Group in the supply chain, the Group 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 above, where we identify that such a reasonable risk exists. In such cases, we 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 we identify a reasonable risk of activities inconsistent with paragraphs 7.4 and 7.5 above, we will respond in the same vein.

9. BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS

No member of the Group will 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.

10. MONEY LAUNDERING

The Group will support efforts, or take steps, to contribute to the effective elimination of

money laundering where we 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.

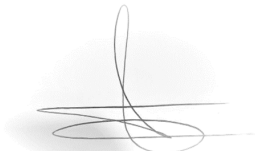
11. PAYMENT OF TAXES, FEES AND ROYALTIES DUE TO GOVERNMENTS

The Group 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 Group member’s position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

12. RISK MANAGEMENT OF BRIBERY AND FRAUDULENT MISREPRESENTATION OF THE ORIGIN OF MINERALS, MONEY-LAUNDERING AND PAYMENT OF TAXES, FEES AND ROYALTIES TO GOVERNMENTS

In accordance with the specific position of the company in the supply chain, we 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. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Signature:



Managing Director

For and on behalf of
Woodcross Resources

Date: 22 January 2024