



## Conflict Minerals Policy

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### Document History

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## **Dathcom Mining SA**

DATHCOM MINING SA is an integrated Lithium Concentrate, Lithium Sulphate, Tin and Tantalum producer with exploration and mining business divisions.

The Company's facilities at Manono in the Tanganyika Province of the DRC comprise, primary tin concentrates, crude tin and secondary tin bearing materials from a combination of its hard rock mining operations, which are primarily lithium focused and from artisanal tin mining, which is a separate business, designed to formalise artisanal mining on the mining lease. Through this formalisation, DATHCOM MINING SA wishes to assist the community to cleanse the industry practices associated with illegal artisanal tin mining in the region. It is the Company's policy to conduct its mining business in a responsible and ethical manner.

## **Dodd Frank Act 1502**

Section 1502 of the United States of America Dodd-Frank Wall Street Reform and Consumer Protection Act, signed into law by President Obama on July 21st, 2010, defines 'Conflict Minerals' as including 'cassiterite and its derivatives' along with two other minerals and gold. DATHCOM MINING SA supports the objectives of this law, to progressively reduce the link between mining and conflict in the eastern Provinces of the Democratic Republic of Congo (DRC) and recognises the disclosure requirements which this law imposes on SEC reporting companies in the US.

## **Conflict Affected and High-Risk Areas**

DATHCOM MINING SA's Manono Lithium and Tin Operations is located within Conflict Affected and High-Risk Areas (CAHRA). DATHCOM MINING SA is fully aware that there are thousands of miners and their dependents within the CAHRA of the eastern DRC and the surrounding region who rely on tin production and its trade, as do thousands more employed in associated services such as transportation.

DATHCOM MINING SA will participate in initiatives that aim to address the CAHRA issues and those defined in the OECD Annex II to ensure that trade will continue in compliance with requirements of the international community. DATHCOM MINING SA will suspend or terminate business relationship with suppliers who supply materials from mines which come under the Annex II risk and who do not address known risks.

## **iTSCI**

DATHCOM MINING SA is a preliminary member, seeking full membership, to the ITRI Tin Supply Chain Initiative (iTSCI) which offers traceability and due diligence systems designed to differentiate between conflict and non-conflict sources in high risk areas and promotes progressive improvement of the mining areas where the artisanal miners operate. All tin concentrates sold by DATHCOM MINING SA from Tanganyika Province shall be obtained through the iTSCI program and in accordance to internationally recognise due diligence guidance.

## Due Diligence

DATHCOM MINING SA shall develop and implement a due diligence management system that aligns with the Organisation for Economic Co-operation and Development (OECD) and the United Nations (UN) guidelines for company due diligence on minerals from CAHRA countries. The US Department of State has endorsed the OECD guidance and encourages companies to draw upon it, as they establish their due diligence practices. These guidelines outline actions that will allow trade to continue while promoting responsible sourcing and progressive improvement.

DATHCOM MINING SA conducts due diligence on its suppliers, materials origin, and transit routes in accordance with Responsible Minerals Assurance Process (RMAP) standard which includes identifying, assessing, and addressing OECD Annex II risks.

## In Country DRC Compliance

DATHCOM MINING SA is also committed to meeting the requirements of Government of the DRC and subscribes to a longer-term sustainability objective of improving the artisanal tin mining on the DATHCOM MINING SA mining Lease. In this respect the Company will explore opportunities for establishing, either unilaterally and/or on a joint venture basis with private companies as well as Governments in industrial size mining projects in CAHRA countries to whom it sells its tin.

DATHCOM MINING SA is also committed to continuously improve its program and performance which includes addressing any grievances brought forth through the RMAP Grievance Mechanism and the company whistleblower Policy PR000-COR-GO-POL-001.