



Supply chain policy

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We, the Bisunzu Mining Corporation (SMB), recognize the risks of negative impacts that may be associated with the extraction, trade, handling and export of ores from conflict and high-risk areas and acknowledge that we have the responsibility to respect human rights and to not contribute to conflicts. We also recognize the importance of transparency in mineral supply chains and the positive impact on the local development of responsible investment in artisanal and small-scale mining projects.

We are committed to adopting and implementing responsible mineral sourcing policies for the following:

- We fully adhere to the traceability standards as defined and recommended by the OECD, the ICGLR and the Congolese Government, to reflect the requirements of due diligence among all actors upstream in the supply chain.

- We are committed to conducting our business in full compliance with all applicable national, regional and international laws and regulations.
- We are committed to maximizing transparency in our supply chain and operations.
- We will ensure that all taxes, fees and charges related to the mining, trade and export of minerals from conflict and high-risk areas are paid to the government and that we undertake to disclose such payments in accordance with the principles set out in the Extractive Industries Transparency Initiative (EITI).

Commitment to the principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

We conduct ongoing and proactive verification of our ore supply chains from the point of extraction to the point of export in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Zones or at high risk.

- We are committed to placing the authority and responsibility of senior management with the necessary skills, knowledge and experience to oversee the supply chain due diligence process;
- We are committed to ensuring internal responsibility for the implementation of the supply chain due diligence process;
- We are committed to communicating the results of supply chain risk assessments to the companies senior management;
- We recognize that the role of public or private security forces in mine sites and / or surrounding areas and / or along transport routes should be solely to enforce the law, to protect people and their property (including human rights), to maintain the safety of the facilities and the protection of the mine site as well as the evacuation (transport) routes from extraction to export in order to avoid any interference or illegal trade.
- When we or any other company / organization in our supply chain contracts public or private security forces, we will engage and demand that these security forces be engaged in accordance with the Voluntary Principles on Security and Human Rights. . In particular, we will support measures to adopt screening policies to ensure that individuals or units of security forces known to be responsible for gross human rights violations are not recruited.
- We commit ourselves to avoid any action contributing to the financing of conflicts. In particular, we do not tolerate and we are committed to eliminating:
 - Any direct or indirect support to non-state armed groups and public or private security forces that:
 - Illegally control mining sites, transport routes, points of sale;
 - Illegally tax or extort money or ores at access points to mine sites, along transportation routes or at points of trade in minerals; and or
 - Illegally tax or extort intermediaries, exporters or international buyers.
 - We consider “direct or indirect support” to include, but is not limited to, sourcing minerals from,

or paying for, or providing logistical to or material assistance to non-government armed groups and public or private security forces.

Commitment to the Fight Against Money Laundering and the Fight Against the Financing of Terrorism

We support efforts and take steps to contribute to the effective elimination of money laundering in situations where we identify a reasonable money laundering risk arising from or related to our supply chain and operations.

- We will not do business with the following customer segments:
 - Persons on official sanction lists;
 - Persons indicating possible involvement in criminal activities, based on information available about them;
 - People with companies in which the legitimacy of the activity or the source of funds can not be reasonably verified;
 - People refusing to provide the required information or documents;
 - Entities whose ownership and control structure cannot be determined.

Commitment to Fight Against Corruption

- We will not offer, promise or give bribes and we will resist bribe solicitation for the purpose of hiding or obscuring the origin of minerals, misrepresenting taxes, fees, and royalties paid to governments for the extraction, trade, processing, transportation and export of minerals;
- We prohibit bribery in all business practices and transactions carried out by our company and / or organization and by agents acting on behalf of our company and organization;
- We are committed to establishing and implementing systems to manage the risks of corruption in our business and / or organization;
- We are taking steps to eliminate all facilitation payments, or to reduce the size and frequency of facilitation payments over time. We have a system of controls in place to monitor, supervise and report on all facilitation payments.

We will immediately suspend or discontinue collaboration with upstream suppliers when we identify a reasonable risk that they:

- Do not have the required licenses, agreements, permits or authorizations that are valid, up-to-date and cover all operations of the company or organization; and or
- Procure or are bound by a party who commits serious human rights violations; and or
- Provide, or are sourcing from, or related to, any party that directly or indirectly supports armed non-

state armed groups and public or private security forces engaged in the illegal activities described above; and or

- Do not ensure that all ores are fully traceable from the well to the foundry, and / or
- Working conditions pose an imminent threat to the lives of employees, subcontractors or visitors.

In keeping with our specific position as an upstream player in the supply chain, we are committed to working with suppliers and relevant stakeholders to design, adopt and implement a risk management plan for all reasonably identified risks in keeping with the Standard Better Sourcing. We are committed to regularly monitoring the performance of upstream suppliers in order to prevent or mitigate these risks through timely action. We will suspend or stop working with suppliers after unsuccessful mitigation attempts.

Processes of the Bisunzu Mining Company for its Supply Chain

There are currently 304 active pits in PE4731 (excluding the Rukaza site). These pits are managed by Pit Managers employing diggers. They extract the mineralized sand for washing in washing stations that are positioned within 100 meters of the extraction pits. Following a first wash, we obtain a pre-concentrated mix that is tagged by the agents of the SAEMAPE assisted by agents from the Mines Division (State agents). The tags are placed in the washing area of the site in question. The ores are then deposited at the transit depot designated for each extraction pit/site after recording the ores entering the said transit depot. SMB holds on site keys to both the transit depots and the central storehouse located at the SMB camp in Bibatama. The diggers can then take their minerals for a second wash in order to increase the concentration of the ores through the use of pros somas. These minerals are weighed and recorded before it being issued a "shipping slip" for the minerals to be taken to the central storehouse of Bibatama camp.

Once at the camp, the minerals are sampled in the presence of State agents and Cooperamma. A "laboratory voucher," is issued to the digger after the analysis of the samples so that he may present this document at SMB's offices in Goma and be paid.

The ores are then tagged for transport from Bibatama to the export preparation site, which is 70 km from the mine, in the city of Goma. The tags are cut in the presence of State agents before being put in drums in the presence of an agent of an independent international company that guarantees the smooth operation of the export process (analysis of the content, verification of stuffing, etc.). Taxes related to the transportation of minerals from Bibatama to Goma and those related to export are all paid in Goma at the appropriate agencies.

A transport contract is signed with the carrier after SMB has been able to verify all the carrier's documentation. The transport of minerals to its final destination happens via the road to one of the African ports; where an export company takes care of all the shipping documentation before the cargo is loaded on a cargo ship.

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