

CAHRAs Identification and Management Procedure

Mining Mineral Resources S.A.S.

Policy Number: PLPBSP22_054

Scope

This procedure applies explicitly to Mining Mineral Resources S.A.S. (MMR) for identifying and managing Conflict-Affected and High-Risk Areas (CAHRAs) when sourcing conflict minerals (3TG - tin, tantalum, tungsten, and gold). It aligns with OECD Due Diligence Guidance (Third Edition), EU Conflict Minerals Regulation (EU 2017/821), and Section 1502 of the Dodd-Frank Act.

Responsibility

The Compliance Manager, John Matt, holds overall responsibility for the implementation, ongoing maintenance, and annual review of this procedure.

Review Schedule

The Compliance Manager conducts an annual review to ensure continuous compliance with international standards, operational requirements, and legal obligations.

OECD Due Diligence Criteria for CAHRA Identification

MMR identifies CAHRAs based on OECD criteria:

- Armed conflict, widespread violence, or other significant risks to people.
- Political instability or repression, institutional weakness, insecurity, and collapsed infrastructure.
- Systematic human rights abuses and violations of national or international law.

Primary Screening Method

MMR screens all supplier countries against:

- US Dodd-Frank Act Section 1502 CAHRA list ([SEC.gov](https://www.sec.gov)).
- EU Conflict Minerals CAHRA list (cahraslist.net).

Countries identified on either list require enhanced due diligence.

Secondary Screening Method

Suppliers operating within a CAHRA country undergo additional screenings against sanction and watchlists:

- UN Security Council Consolidated List: un.org
- DRC Central Bank (BCC) Terrorist List: [FATF Increased Monitoring](#)
- EU Sanctions List: eur-lex.europa.eu
- **Dow Jones Watchlist:** [Dow Jones Risk & Compliance](#)
- OFAC (US Government) Sanctions List: [OFAC Sanctions Search](#)

These checks occur:

- During initial supplier onboarding.
- Each 5 years as required by OECD.
- Immediately upon notification of relevant incidents or material changes.

Identification on any sanction/watchlist triggers immediate procurement suspension and a detailed compliance review.

Additional Risk Assessment Tools

MMR also utilizes:

- **Fragile States Index (FSI):** Human Rights and Rule of Law score ≥ 8.0 .
- **Worldwide Governance Indicators:** Control of Corruption ≤ 30 th percentile.
- Heidelberg Conflict Barometer: Conflict intensity score ≥ 3 .
- **Control Risks Security Risk Map:** Medium, High, or Extreme risk rankings.

Meeting any of these criteria classifies the country as CAHRA, triggering enhanced due diligence.

Enhanced Due Diligence (EDD)

Mandatory EDD for CAHRA-classified countries includes:

- Initial site visits within three months of desktop due diligence.
- Annual follow-up site visits; frequency increases if red flags or significant risks are detected during initial assessments or subsequent monitoring.
- Thorough background and integrity checks on suppliers.
- Comprehensive record-keeping of all EDD activities and outcomes.

Internal Reporting and Escalation

The Compliance Manager compiles an internal compliance report documenting the approval or rejection of sourcing from CAHRAs. Any severe compliance issues or critical risks identified are escalated promptly to senior management and, if necessary, the Board of Directors.

Record keeping

Records related to due diligence activities, CAHRA assessments, site visits, sanction screenings, and compliance reports are securely retained for a minimum of five years.

Training and Awareness

Annual training provided to relevant employees includes:

- Understanding of CAHRA criteria and international regulatory obligations.
- Familiarization with primary and secondary screening methods.
- Procedures for reporting compliance issues and risks.

Attachments

- CAHRA Assessment Form

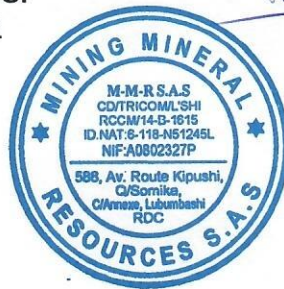
THIS DOCUMENT HAS BEEN REVIEWED AND APPROVED BY MMR'S RISK MANAGEMENT COMMITTEE.

Authorized Representative:

Mr. John Matt – Compliance Manager

Mining Mineral Resources S.A.S.

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PREPARED BY: RISK & COMPLIANCE TEAM

APPROVED BY: KUMAR THANGAVEU

ISSUED BY: MMR MANAGEMENT

NEXT REVIEW: FEBRUARY 2026

ANNEXE

**MMR CAHRAs Identification and Management
Procedure**

Scope

The following CAHRA procedure applies to Mining Mineral Resources S.A.S. (MMR) dealing with conflict minerals 3TG.

Responsibility

The Compliance Manager, John Matt, will be responsible for the implementation and maintenance of this CAHRA Identification Procedure.

This CAHRA Identification Procedure is accessible to all MMR employees.

Review Schedule

The CAHRA Identification Procedure is reviewed and applied regularly.

Review: Compliance Manager, John Matt, will assess the effectiveness annually. The purpose of the annual review is to align the procedure with MMRs operations and objectives.

Updates: This procedure will be reviewed and updated annually to comply with the definition of CAHRAs as described by European Union (EU Directive and OECD Guidance to determine countries MMR sources from.

OECD Due Diligence Criteria

- A) The presence of armed conflict, widespread violence, or other risks of harm to people. Armed conflict may take a variety of forms including conflict of international or non-international character.
- B) Areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, and widespread violence.
- C) Widespread human rights violations: Areas characterised by widespread human rights abuses and violations of national or international law.

Primary Screening Method

If supplier country of origin is not listed by MMR as CAHRA then it will be checked against Dodd Frank 1502 and EU lists of CAHRAs

Section 1502 Dodd Frank Act (<https://www.sec.gov/rules/final/2012/34-67716.pdf>)

EU CAHRA List (<https://www.cahraslist.net/>)

Should a country not be identified as a CAHRA by the primary screening method by Section 1502 Dodd Frank Act or EU CAHRA list, then MMR's will make the following determinations. The area may be identified to be conflict-affected or high-risk according to the following resources and thresholds. If the 4 resources result in a finding of high-risk, country is considered CAHRA.

Secondary Screening Method

If supplier(s) is operating in the CAHRA country, MMR will check if the upstream actor (holders) are not including in all relevant sanction list:

- UN Security Council Consolidated List, <https://www.un.org>
- DRC Central Bank (BCC) terrorist list, <https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/increased-monitoring-october-2024.html>
- EU Sanctions List, <https://eur-lex.europa.eu/>
- Dow Jones Watchlist, https://developer.dowjones.com/documents/site-docs-risk_and_compliance_feeds-watchlist_ame_soc-dow_jones_watchlist
- OFAC List (US government), [Sanctions List Search Tool | Office of Foreign Assets Control](#)

Resource	Risk Criteria	Indicator	Score
The Fragile States Index (FSI, formerly the Failed States Index)	Risks of harm to people; Political instability or repression, Institutional weakness, Insecurity Collapse of civil infrastructure, Widespread human rights abuses, Violations of national or international law	A country attaining a score at Human Rights and Rule of Law (P3) of 8.0 or higher on the FSI shall be used to determine if it should be considered as a CAHRA.	
Worldwide Governance Indicators	Governance, with a focus on corruption or to the extent that public power is exercised for private gain	A country attaining a score of 30 percentile or lower on the Control of Corruption shall be used to determine if it should be considered as a CAHRA.	
Heidelberg Conflict Barometer	Presence of armed conflict, widespread violence	A country attaining a score of 3 or higher on the Heidelberg Conflict Barometer shall be used to determine if it should be considered as a CAHRA.	
Control Risks Map: Risk Map Africa	Political and security risk	A country ranked medium, high, or extreme risk on Security Risk Map	

		shall be used to determine if it should be considered as a CAHRA.	
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Procedure

The Compliance Manager, John Matt, will work with the due diligence team once a year, or as needed, to address any relevant occurrences whether the country the smelter and mine operate in are considered a CAHRA based on the criteria defined above as identified by in the *OECD Due Diligence Guidance for Responsible Supply Chains and Minerals from Conflict-Affected and High-Risk Areas Third Edition*.

- A) Conduct a CAHRA assessment using company's CAHRA assessment form for all countries that processed material originates from. If a country is assessed by the US Dodd-Frank Act or the EU list to be CAHRA as per Primary Screening Section previously described., no further action is needed and the material will be part of the enhanced due diligence.
- B) If the country is not classified as a CAHRA as per Primary Screening Method of this document, alternative sources (Secondary Screening) to determine if a country is CAHRA should be used.
- C) After completing the CAHRA form, Compliance Manager, John Matt will determine and sign a region/country status, one being either CAHRA or not.

CAHRAs Identified

Enhanced Due Diligence will be implemented for all material associated with countries identified as CAHRAs.

Recordkeeping

Maintain related records for a minimum 1 year, preferably on a computerised database.

Internal Reporting

Based on the results of the data collected, Compliance Manager, John Matt, will compile a report for either approving or denying minerals from CAHRA countries the supplier(s) operate.

Attachments

CARHA Assessment Form

CAHRA ASSESSMENT FORM

COUNTRY AND REGION OF ORIGIN: Democratic Republic of the Congo

ASSESSMENT DATE: 23 January 2025

ASSESSMENT CHECK BOX

Status	Dodd-Frank's CAHRA List	EU's CAHRA List	Alternative Sources
Yes	Yes	Yes	No

ALTERNATIVES SOURCES

Alternative sources are only used when a country is not on either the Dodd-Frank or EU CAHRA list.

Resource	Risk Criteria	Indicator	Score
The Fragile States Index (FSI, formerly the Failed States Index)	Risks of harm to people; Political instability or repression, Institutional weakness, Insecurity Collapse of civil infrastructure, Widespread human rights abuses, Violations of national or international law	A country attaining a score at Human Rights and Rule of Law (P3) of 8.0 or higher on the FSI shall be used to determine if it should be considered as a CAHRA.	
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Control Risks Map: Risk Map Africa	Political and security risk	A country ranked medium, high, or extreme risk on Security Risk Map shall be used to determine if it should be considered as a CAHRA.	

A. RECOMMENDATION

DR Congo is CAHRA by US Dodd-Frank.

To conform to MMR's Supply Chain and RMAP process, all mines within DRC must be visited in the period of first 3 months after they had passed desktop Due Diligence and delivered the first batch of minerals. Visits should be done at a frequency of once per year. However, a higher frequency may occur as needed.

B. CONCLUSION

DR Congo is considered a High-Risk source.