



Conflict Minerals Policy and due diligence plan of TMT Metals in accordance with OECD

The following levels of Due Diligence shall be conducted by any employee of TMT Metals AG handling minerals originating from any conflict region, especially the Great Lakes Region in East Africa.

The Management of TMT Metals AG ultimately signs off any business conducted in above mentioned region given a full due diligence in accordance with OECD guidelines has been conducted.

1. Communication

TMT Metals communicates to its clients, suppliers and to the public via their webpage and corporate brochures, that it adheres to the conflict minerals policy of the OECD and that it conducts due diligence on the origination of minerals and the supply chain. The due diligence addresses every party involved in the supply chain, especially the *comptoir*, *negociant* and the *miners* themselves.

2. Structure of Due Diligence

Within TMT Metals the management of the company, Dragan Kilibarda, Head of Trading, is ultimately the person approving business in conflict regions. Every employee active in the GLR has to report to the Head of Trading at any time about developments and due diligence of supply chain members involved.

First and foremost, TMT Metals AG only engages with suppliers that are approved by iTSCI themselves and that adhere to the policy of conflict minerals issued by the OECD. In consequence, all supplies will be traced by the presentation of all mine tags including the mine name list, ownership, middle men and the *comptoir* themselves.

TMT Metals AG is holding quarterly meetings with its suppliers in regards to the implementation of OECD guidelines and supports the businesses with knowledge and assists suppliers in building capacities with a view to improving due diligence performance.

3. Warning and whistle blowing mechanism

TMT Metals AG holds meetings with senior management at the *comptoir* and encourages whistle blowing. At the same time TMT Metals AG is monitoring every change in supply or personal in the supply chain to comply with an early-warning mechanism and to raise awareness

4. Know Your Client, identify and assess the supply chain

TMT Metals AG will conduct a full DD on every senior manager at the *comptoir* and *negociant*, including CV, background check and personal statement of not trading in conflict minerals.

TMT Metals AG conducts a DD on the standards of the due diligence of the suppliers and ensures that those are consistent with the requirements by OECD guidelines.

5. Reporting Mechanism

Within TMT Metals AG no trades in the GLR region or any other conflict region can be conducted without the prior consent of the Head of Trading. This ensures the highest level of integrity to ensure compliance with OECD guidelines.

If a fault or failure in the compliance with OECD guidelines in the supply chain is detected, TMT Metals AG will immediately suspend trade with the respective supplier and inform PACT and iTSCI office employees. At the same time, TMT Metals will instruct its suppliers to comply with OECD guidelines and if after continuous efforts compliance is not reached, TMT Metals AG will completely disengage with the respective suppliers.

6. Further Due Diligence measures

TMT Metals AG will engage with third party audit companies to ensure the compliance with OECD guidelines and works closely with iTSCI, EICC and GeSI to adapt the highest standards of ensuring compliance with OECD principles.

7. Corporate Social Responsibility

TMT Metals ensures a CRS program which includes the integrity of the supply chain mechanism and policies. They are being disclosed on the company's webpage, the annual report and in contracts with suppliers. To ensure a responsible global supply chain, TMT Metals commits to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the *OECD Model Supply Chain Policy* specified in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains.

8. Periodic Review and awareness-raising activities

The Conflict Minerals Policy of TMT Metals in accordance with OECD is subject to a compulsory periodic evaluation and review during each annual general meeting. The same compulsory periodic evaluation and review will take place if an extraordinary general meeting will be held. TMT

Metals updates the policy based on a valid final decision made during an annual or extraordinary general meeting as part of its awareness-raising activities.

This policy has been in effect as of 1st of January 2018.

On behalf of the company and the shareholders of TMT Metals AG

Dragan Kilibarda,
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TMT Metals AG



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