

## **COMPANY CONFLICT MINERALS POLICY**

Ngali Mining Limited (NML) is a Rwandan company established under the laws of the Republic of Rwanda. Among NML's business activities will be the mining and trading of the 3 T's minerals (Tin, Tantalum and Tungsten).

This policy on Conflict Minerals is prepared by the Management of NML to inform all company's stakeholders, staff, suppliers, customers and other interested bodies, about its commitment to source only Conflict free minerals.

NML is committed to conduct its business activities in a responsible and ethical manner. The company has therefore resolved to comply with and implement all relevant regulations that will ensure it sources minerals that are conflict-free. Among these regulations are the guidelines released by both the Organization for Economic Co-operation and Development (OECD) and the United Nations (UN). These guidelines outline actions that will allow trade to continue while promoting responsible sourcing and progressive improvement.

NML considers conflict free minerals as those that have been sourced according to OECD due diligence guidelines in Annex II aimed at cutting trade that may directly or indirectly finance or benefit armed groups in the conflict and high-risk areas.

Pertaining to this policy, NML commits to:

- Inform direct suppliers about this Conflict Minerals Policy
- Work with its suppliers to understand the chain of custody for conflict free minerals.
- Encourage suppliers to track and improve their performance in sourcing minerals that are validated as being conflict-free in accordance with applicable recognized due diligence framework.
- Cooperate with organizations such as the Organization for Economic Cooperation and Development (OECD), International Tin Research Institute (ITRI), International Conference on the Great Lakes Region (ICGLR), Responsible Minerals Assurance Process (RMAP) and other relevant organizations to put in place credible and effective

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processes that seeks to ensure that only conflict-free minerals enter NML mineral supply chain.

NML encourages its suppliers to:

- Assist NML in complying with applicable regulations related to conflict minerals and provide all necessary declarations.
- Undertake reasonable due diligence within their supply chain to determine the chain of custody and origin of traded minerals. Due diligence includes developing policies and management systems to use conflict free minerals, including making these requirements apply to their agents in the supply chain.
- Comply with information requests on the source and origin of conflict free minerals provided to NML. Chain of custody data to be maintained for five years and be provided to NML upon request.
- Maintain records that document NML's compliance with applicable laws and regulations regarding conflicts free minerals, including those related to conflicts free minerals due diligence, for a period of no less than five years.

NML will work with its suppliers to seek remedies for non-compliance with this policy. These remedies may include suspension or discontinuing engagement with the supplier.

NML will make sure enough and skilled staff are allocated to ensure the implementation this Conflict Minerals Policy. NML will appoint a staff in charge of the company's Due diligence.

Violations or potential violations of this policy should be reported by employees to their manager or to the Legal Department.

NML remains committed to review and update its policy on conflict minerals as necessary as possible considering any development in the mineral trade and extraction environment.

  
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Fabrice Kayihura  
Managing Director  
Ngali Mining

