



## SUPPLY CHAIN POLICY STATEMENT

Fenix Metals Sp. z o.o. is aware of the concern of its customers following the adoption by the US Securities and Exchange Commission (SEC) of a „final rule” pursuant to Section 1502 of the Dodd- Frank Wall Street Reform and Consumer Protection Act relating to the use of conflict minerals originating from the Democratic Republic of Congo (DRC) and adjoining countries and all conflict-affected and high-risk areas, and addresses not just armed groups, but all risks identified in the Annex II OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our company strategy to respond to risks, should any be identified through our due diligence, would follow the recommended actions for disengagement or mitigation and timescales outlined in Annex II.

Fenix Metals is a member of ITA, the global tin trade association, which has led the ITSCI (International Tin Supply Chain Initiative), assisting upstream companies purchasing from the DRC and adjoining countries to develop due diligence systems conforming with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Its objective is to help companies respect human rights and avoid contributing to conflict through their mineral sourcing practices. Fenix Metals supports the efforts of ITSCI to cultivate transparent mineral supply chains and sustainable corporate engagement in the mineral sector with a view to enabling countries to benefit from their mineral resources and preventing the extraction and trade of minerals from becoming a source of conflict, human rights abuses, and insecurity.

In addition, Fenix Metals has voluntarily and successfully participated in the RMI’s (Responsible Mineral Initiative) RMAP (Responsible Mineral Assurance Process) for several years in order to demonstrate our commitment to avoiding contributing to risks in minerals supply chains. Fenix has also supported the ITA in their cooperation with RMI to develop a joint ITA-RMI Assessment Criteria which is closely aligned with the OECD Guidance. Fenix Metals also participates in the ITA Code of Conduct to transparently report on our wider environmental, social and governance performance.

The raw materials purchased by Fenix Metals Sp. z o.o. are primarily secondary materials, being either waste or processed metals created during product or metal manufacturing. Any pure tin or tin smelter’s byproducts purchases are solely from RMAP conformant sources. We do not buy any tin mineral concentrates. Fenix Metals participates in the Responsible Minerals Initiative (former Conflict Free Sourcing Initiative) and has implemented the Responsible Minerals Assurance Process Tin and Tantalum Standard to remain it’s Conformant Smelter Status. As the rules require our policy is shown on our website: [www.fenixmetals.com](http://www.fenixmetals.com), and the policy is reviewed on an annual basis.

Fenix carries out the steps of the OECD Guidance which are relevant to our raw materials, including having a due diligence policy, management system, and system for control and transparency of our supply chain, engaging with suppliers, and providing a grievance mechanism, reviewing of raw material and supplier information for red-flags, and also having an independent audit and publicly reporting. The metals and products made by Fenix Metals are from responsible sources and we have not identified any links with Conflict-Affected and High-Risk Areas which would require mitigation or disengagement.





In support of the above, all of Fenix Metals's relevant staff members are provided with appropriate authority and resources, directed to follow and trained on procedures to implement minerals due diligence management system that aims to:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Guidance and encourage our suppliers to do the same.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to minimize any risk that tin-containing material in our supply-chain may contribute to illegal armed groups, human rights abuses, or other risks as defined in Annex II of OECD Guidance.
- Communicate critical information such as our policy, strategy and questions on any risks to our suppliers and other employees for action.

Any concerns about our policy or due diligence system should be reported through our grievance mechanism [grievance@fenixmetals.com](mailto:grievance@fenixmetals.com).

Fenix Metals Sp. z o.o.

Michael Yde Marcussen, President  
2019-05-06

