

## Zopco Conflict Minerals Policy

Zopco is committed to conducting its business, through its employees, directors, officers and agents, in compliance with all applicable laws and in a responsible, honest, sustainable and ethical manner. Zopco believes that a commitment to honesty, sustainability and ethics is essential for building long-term and trusting partnerships with customers, business partners, shareholders and the communities in which it operates.

In 2012 the U.S. Securities and Exchange Commission (SEC) issued a final rule on conflict minerals based on section 1502 of the Dodd-Frank Act. This rule obliges US stock listed companies to declare whether the tin, tantalum, tungsten and gold in their products have originated from the Democratic Republic of Congo or an adjoining country.

The Organization for Economic Cooperation and Development (OECD) has formulated due diligence guidance for responsible mineral supply chain activities related to conflict-affected and high-risk areas. Particular note is paid to Annex II which details the 'Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas'.

Considering the human rights and other risks that may be connected to the extraction, trading, handling and exporting of minerals from conflict-affected and high-risk areas, and our commitment to support and contribute to the respect of human rights and ethics in business, Zopco has adopted a specific policy on conflict minerals from conflict-affected and high-risk areas. While Zopco is not itself subject to the reporting requirements of Dodd-Frank, we use these rulings, and the OECD Guidelines, as the basis for our policy.

When sourcing minerals from conflict-affected and high-risk areas, Zopco will review the existence of the below and when identified will neither tolerate nor profit from, contribute to, assist with or facilitate the commission by any party of:

- any form of torture, cruel, inhuman and degrading treatment;
- any form of forced or compulsory labor;
- any form of child labor;
- other gross human rights violations and abuses such as sexual violence;
- war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

We will furthermore not give nor tolerate any direct or indirect support to non-state armed groups or to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at points of access to mine



sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

Zopco will immediately suspend or discontinue engagement with upstream suppliers where we have identified a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed group

We will not offer, promise, give or demand any bribes, including kickbacks, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Zopco commits to submit its policy to its suppliers. We request that our suppliers comply with this policy when extracting, sourcing, transporting, trading, handling or exporting minerals from conflict-affected and high-risk areas. We are willing to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to prevent or mitigate risks.

In case we have reasonable belief that a supplier fails to comply with this policy, we will suspend or discontinue the dubious supply.

