

KISWIRE GROUP CONFLICT MINERALS POLICY

1. Objective

The purpose of this Conflict Minerals Policy is to ensure Kiswire compliance to use all raw materials from legal and sustainable origins. All Kiswire suppliers must comply with applicable laws and regulations regarding Conflict Minerals which include tin, tungsten, tantalum and gold.

They are expected to ensure that products supplied don't contain metals originated from conflict regions that directly or indirectly finance or benefit armed groups violating human rights.

At Kiswire, we are conscious that the choice and control of our suppliers, especially in the precious metal trading and in sourcing raw materials, is of key importance for a business activity focusing on sustainability.

2. Scope

This Conflict Minerals Policy applies worldwide to all suppliers who maintain business relations with Kiswire for the delivery of minerals or products containing minerals.

3. Definitions

Conflict Minerals: Refers to columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. Tantalum, tin, tungsten and gold are the widely accepted derivative metals to be of interest at present and are the current focus of the EICC-GeSI conflict free smelter certification program.

DRC Adjoining Countries: Are countries that share an internationally recognized border with the Democratic Republic of the Congo. The following countries are currently recognized as "adjoining countries": Angola, Burundi, Central African Republic, Congo Republic (a different nation than DRC), Rwanda, South Sudan, Uganda and Zambia.

DRC Conflict Free: As defined in Section 1502 of the Dodd-Frank Act, "a product may be labelled as 'DRC conflict free' if the product does not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country."

4. Responsibilities

This policy applies to Kiswire global business operations. It is the responsibility of the Purchasing department for the communication and liaison with the supplier, including the recording and monitoring of supplier compliance. So, employees whose responsibilities relate to the supply or sourcing of parts, components and materials should be informed and are expected to comply with these requirements and associated legislation or regulation.

5. Principles

Kiswire commitment

Kiswire is committed to the responsible sourcing of minerals, ensuring its worldwide operations in a manner that complies with applicable laws and regulations regarding the Conflict Minerals:

- by informing direct suppliers about this Conflict Minerals Policy and its relationship to the Kiswire Group Supplier Code of Conduct;
- by working with its direct suppliers and sub-suppliers to understand the chain of custody for Conflict

- Minerals at least to the smelter or refiner level;
- by taking the measures to source parts and components from its direct suppliers and sub-suppliers that are DRC conflict-free;
- by prompting direct suppliers to follow and improve their procurement performance in sourcing minerals from their suppliers and sub-suppliers validated as being DRC conflict-free under a due diligence framework recognized at national or international levels.

Kiswire expectations from suppliers

Kiswire relies on its suppliers to identify the sources of Conflict Minerals and to declare the Conflict Minerals status of the products they sell to the Company.

As a result, the Company expects each of its suppliers to:

- support Kiswire for the compliance with all regulations related to Conflict Minerals and provide all necessary declarations;
- Identify any Conflict Minerals supplied to Kiswire or contained in products supplied to Kiswire;
- Conduct appropriate due diligence on their supply chains to determine the chain of custody and origin of Conflict Minerals by developing policies and management systems for the use of conflict-free minerals in the DRC, including ensuring that these requirements apply to their direct suppliers and subcontractors and requiring them to do the same with the lower levels of suppliers;
- Take necessary measures to purchase parts, components or materials from their direct suppliers and sub-suppliers who source minerals from smelters or refineries validated DRC conflict free in accordance with a recognized due diligence system at the national and international levels;
- Provide Conflict Minerals sourcing information reasonably requested by Kiswire and necessary to the Company fulfilling its own due diligence and reporting obligations;
- Conduct appropriate processes for maintaining records and documentation reflecting compliance Kiswire with applicable laws and regulations regarding Conflict Minerals, including those relating to due diligence for minerals conflict.

Non-compliance to the policy

Kiswire will work with its suppliers to seek remedies for non-compliance with this policy.

These remedies may include that Kiswire may reconsider its willingness to partner with suppliers that fail to comply with this Policy and proceed to suspension or discontinuing engagement with them.

6. Reference / Annex

This policy applies to Kiswire global business operations. It is the responsibility of the Purchasing department for the communication and liaison with the supplier, including the recording and monitoring of supplier compliance. So, employees whose responsibilities relate to the supply or sourcing of parts, components and materials should be informed and are expected to comply with these requirements and associated legislation or regulation.

Page | 2

Additional information about the OECD due diligence guidelines

<http://www.oecd.org/investment/mne/mining.htm>

Dodd-Frank Wall Street Reform and Consumer Protection Act relating to the use of Conflict Minerals

<https://www.ecovadis.com/dodd-frank-act-section-1502/>

The EICC-GeSI Conflict Minerals reporting template

<http://www.conflictreesourcing.org/conflict-minerals-reporting-template/>

The list of compliant smelters and refiners

www.conflictreesourcing.org

Kiswire Group Supplier Code of Conduct



KISWIRE GROUP
Supplier Code of C