



**BERIUM GROUP**

global commodities  
& resources within reach

## CONFLICT MINERALS POLICY

*Berium Group engages in strategic sourcing, marketing, risk management, shipping & logistics, trading and supply of a wide portfolio of essential commodities on global scale; including: energy, metals and minerals, agri-products and chemicals among other bulk raw materials and finished products.*

*The fundamental purpose of Berium Group Conflict Minerals Policy is to promote integrity and sustainability by advancing cogent ways for legitimate minerals from the designated countries as per OECD Guidelines to enter the global supply chain, thereby responsibly supporting the economies of the regions and the local communities that depend on mining and minerals trade as their core economic activity.*

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Conflict Minerals refer to minerals such as cassiterite(tin), columbite-tantalite, wolframite (tungsten), gold (3TG) and their derivatives which are mined in regions where human rights abuses, armed conflict and environmental harm may exist.

Berium Group adheres to international policies with benchmark stipulations for transparent, responsible, ethical and sustainable business operations. We are committed to conducting our business in full compliance of all relevant international rules, conventions and regulations relating to supply chain of 3TG minerals. The group will not involve in any activities directly or indirectly which could contribute to financing of conflict.

We will always work with our producers and suppliers to trace material content in the mineral commodities they supply to us down to a conflict free certified smelter and to provide documentation regarding all due diligence efforts. We aim to undertake reasonable due diligence within our supply chain to ensure that specified metals are not being sourced from conflict mines. We will require our suppliers to procure products containing tin, tantalum, tungsten, and/or gold from sources that have been identified to be conflict-free.

In full consideration of the recommendations of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Afflicted and High Risk Areas, **Berium Group** has adopted the stipulated guidelines to ensure utmost care and due diligence is complied with throughout administration and trading of minerals from the conflict areas. Consistently the following instructions are assimilated in all our commercial operations for mineral resources:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
  - i) any forms of torture, cruel, inhuman and degrading treatment;
  - ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
  - iii) the worst forms of child labour;
  - iv) other gross human rights violations and abuses such as widespread sexual violence;
  - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
2. Berium Group will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.
3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals

from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i)* illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii)* illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii)* illegally tax or extort intermediaries, export companies or international traders.

**4.** We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

**5.** We agree to eliminate, in accordance with paragraph 10, direct or indirect support 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 point 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.

**6.** We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

**7.** Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

**8.** We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

**9.** We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

**10.** In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists.

In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

**11.** We will not offer, promise, give or demand any bribes, 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.

**12.** We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

**13.** We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

**14.** In accordance with the specific position of the company in the supply chain, we commit 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 preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation

We are committed to doing business only with partners, entities, companies or persons who share our values. This policy will be reviewed annually to accommodate and keep apace with global dynamics in mineral resource commodities.

*Direct questions regarding this policy to: [integrity@beriumgroup.com](mailto:integrity@beriumgroup.com)*

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