

CAHRA Procedure

Standard Policy & Procedure to Identify & Assess Conflict Affected and High-Risk Areas (CAHRA)

Overview:

Tin Technology and Refining, LLC (Tin Tech) is a secondary smelter of nonferrous metal that has been in operation since 2014. Tin Tech works with customers in a variety of industries to recycle their tin and solder alloy production scrap.

Tin Tech recognizes that tin concentrates and minerals found within the global supply chain may originate from areas prone to armed conflict and human rights abuses. As part of the company commitment to corporate social responsibility, Tin Tech is committed to avoiding minerals that directly or indirectly finance or benefit armed groups or support regions known for human rights violations. These regions are categorized as conflict affected and high-risk areas (CAHRA) based on the following criteria as identified by the OECD Due Diligence Guidance:

- a. *Conflict*. Conflict shall mean a political conflict, i.e., a perceived incompatibility of intentions between individuals or social groups as further defined in the Heidelberg Conflict Barometer.
- b. *Human Rights*. Human rights shall refer to violations of the core international conventions on human rights including the International Covenant on Civil and Political Rights, International Covenant on Social and Economic Rights, and the Universal Declaration of Human Rights.
- c. *Good Governance*. Good governance shall refer to the lack of corruption, i.e. the abuse of entrusted power for private gain. It can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.
- d. The Democratic Republic of Congo and its nine adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) as outlined in Section 1502 of the Dodd Frank Act.
- e. The EU CAHRA list located at <https://www.cahaslist.net/cahas>

It is the responsibility of the Due Diligence Manager to determine all CAHRA's as they relate to Tin Tech's supply chain and suppliers.

Process

The Due Diligence Manager appointed by the General Manager will review the above-mentioned criteria against the following threshold. Countries with scores outside of the outlined threshold will be further evaluated.:

- *Heidelberg Conflict Barometer*. This resource addresses political conflict. Threshold - a score of 4 or higher on the Heidelberg Conflict Barometer.
- *Fragile State Index – P3 indicator*: This resource addresses human rights. Threshold – a score of 6 or higher as indicated by the P3: Human Rights and Rule of Law indicator
- *Worldwide Governance Indicators*: This resource addresses governance. Threshold - a score in the 40th percentile or lower in the worldwide governance indicators.
- Additionally, Tin Tech utilizes the RMI Risk Maps as a resource as well as industry groups such as ITRI and ATTA.

Due to the fact Tin Tech does not source concentrates, the event that the above thresholds are met within Tin Tech's supply chain is highly unlikely. Nevertheless, in that unlikely event that thresholds are met, the Due Diligence manager should present findings to the General Manager to then follow the risk assessment process.

Frequency

The Due Diligence Manager will perform this procedure at a minimum: 1) As each resource becomes updated and available 2) Annually