

## **Purchase and Trading Policy of E & C Trading Ltd.**

E & C Trading Ltd. is a Swiss trading company committed to only purchase and trade ethically-sourced minerals. Our commitment to socially responsible business practices includes the promotion of responsible supply chains.

E & C Trading Ltd. takes proactive actions to ensure it does not trade any 3TGs from the conflict region. We comply with applicable legislation such as the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act (July, 2010) and the European Union regulation on conflict minerals. These laws seek to sever the link between minerals' mining and social conflicts by encouraging responsible trade of minerals sourced from the Democratic Republic of the Congo (DRC) and the Great Lakes Region of Africa, or from other identified CAHRAs.

In order to achieve the best results E & C Trading Ltd. is adhering to the Organization for Economic Cooperation and Development (OECD) 5-Steps Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High- Risk Areas (CAHRAs) and the 14 points of its Annex II Model Supply Chain Policy addressing: serious abuses associated with the extraction, transport or trade of minerals, direct or indirect support to non-state armed groups, public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, money-laundering, and payment of taxes, fees and royalties due to government. Thus our risk management includes, among others: continuing trade throughout the course of measurable risk management efforts, temporarily suspending trade while pursuing ongoing mitigation efforts, and disengaging with a supplier in cases where mitigation appears not feasible or unacceptable.

E & C Trading Ltd.  
15 June 2021