



CAHRA policy

**For MINEXX and Local Minerals Exporters
Effective 18 October 2024**



Minexx is committed to the responsible production and sourcing of minerals in our supply chain. Minexx is aware that, particularly for conflict-affected and/or high-risk areas, businesses in the mining space are often at risk of (directly or indirectly) association with negative impacts on communities, including abuses of human rights, perpetuating conflicts and financial crimes.

Minexx consciously seeks to minimise any negative impact through alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition (OECD Guidance) which it applies to its suppliers of minerals where production involves extraction, transportation or trade from or through any conflict-affected and/or high-risk area.

In determining conflict-affected and high-risk areas, Minexx uses the EU's Conflict-Affected and High-Risk Areas (CAHRA) list (available at <https://www.cahraslist.net/cahras>) and the Responsible Minerals Initiative's (RMI) Global Risk Map (<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/rmi-global-risk-map/>).

Minexx adheres to the RMI approach of following the OECD's five-step framework for risk-based due diligence in alignment with Annex I of the OECD Guidance. Minexx works to adhere to these standards in working to identify, assess and mitigate, and to publicly report on potential or actual adverse risks in its supply chain that are associated with CAHRAs. In particular, Minexx is aware of and seeks to mitigate the critical risks associated with CAHRAs including the following:

1. Serious abuses associated with the extraction, transport or trade of minerals, which covers: (a) any forms of torture, cruel, inhuman and degrading treatment; (b) any forms of forced or compulsory labour, which means work or service that is exacted from any person under the menace of penalty and for which the person has not offered themselves voluntarily; (c) the worst forms of child labour; (d) other gross human rights violations and abuses such as widespread sexual violence; (e) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
2. Direct or indirect support to non-state armed groups;
3. 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;
4. Bribery and fraudulent misrepresentation of the origin of minerals;
5. Money laundering;
6. Non-payment of taxes, fees and royalties due to governments. Minexx expects our suppliers of minerals to carry out due diligence on their minerals supply chains to identify, assess, and mitigate the risks contained in Annex II of the OECD Guidance that are associated with CAHRAs.

7. Scope;

This Minexx Policy applies to:

- All employees and management
- Suppliers, contractors, and business partners
- All mineral supply chains managed or influenced by the Company

8. Risk Identification and Assessment;

- Mapping of supply chains
- Identification of CAHRA risks
- Site-level and supplier-level assessments

9. Risk Mitigation

- Development of Corrective Action Plans (CAPs)
- Engagement with suppliers to improve practices
- Suspension or disengagement where risks are severe.

High-Risk Situations (Immediate Disengagement), Minexx will immediately suspend or terminate relationships in cases of:

- Direct support to armed groups
- Severe human rights abuses

It covers all sourcing activities in regions identified as CAHRAs, including countries such as the Democratic Republic of the Congo and similar contexts.

Where risks are identified, Minexx will work alongside its supplier to manage such risks. If a risk cannot be managed, Minexx will seek to terminate its relationship with the supplier.

Minexx has a grievance mechanism under which our suppliers (or other internal or external third parties) may parties report any risks, complaints or other grievances, in a confidential, or if chosen, anonymous manner without fear of retaliation, punishment or discipline. This mechanism is available through Minexx's website at Minexx.co.

This Policy is approved and enters into force on October 18, 2024.

Prepared by Dominique Kahigire	Reviewed by Lucien Bahimba	Approved by	Laurent Van Houcke
Role	Head of Responsible Sourcing	Role	General Manager
Date	October 2024 and April 2026	Date	October 2024 and April 2026
Signature		Signature	