



## **Welsbach Holdings Pte Ltd Conflict Minerals Policy May 2021**

Welsbach Holdings Pte Ltd (“Welsbach”) invests in, advises and supports supply chains for energy transition metals products and industrial raw materials. Welsbach services the needs of customers that operate across numerous locations, by facilitating the marketing, processing, financing, and transportation of essential raw materials such as nickel, graphite, cobalt, lithium, rare earths, tantalum, tin, tungsten, and gold. Sourcing products from jurisdictions such as Brazil, Nigeria, Canada, Australia, and Indonesia, Welsbach supplies high-growth demand markets across the world. At Welsbach, we are committed to adhering to the responsible sourcing of tantalum, tungsten, tin, and gold (“3TG Minerals”) which the EU Conflict Minerals Regulation views as at risk of financing armed conflict or of being mined using forced labor. We commit to comply with all applicable national and international laws relating to 3TG Minerals.

Welsbach and any of its subsidiaries that engages or may engage in the future in trading 3TG Minerals acknowledge the various EU and US laws and regulations that require additional due diligence on 3TG Minerals. Because the extraction, handling, processing, transportation, and trade of 3TG Minerals has the potential to contribute to, benefit from, or result in adverse social and environmental impacts. We at Welsbach aim to identify and mitigate all significant social and environmental risks in our supply chain. As such, we will only partner with suppliers who share a similar view and who adopt similar standards.

Welsbach intends to ensure that all trading activities regarding 3TG Minerals are attached to traceability initiatives (such as ITSCI and BSP) that aim to advance transparency, chain of custody, validation, and certification mechanisms, that together assure purchasers that their products are not contributing to conflicts and come from sustainable sources.

In addition to following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals (“OECD Guidance”) from Conflict-Affected and High-Risk Areas (CAHRA), Welsbach:

- will seek to impose obligations into its purchase contracts with its suppliers selling 3TG Minerals to comply with the OECD Guidance and/or comply with ITSCI and BSP requirements. The documents which confirm the sourcing of such minerals are eventually passed to the ultimate purchasing smelters and processors where required.
- will only deal with 3TG Mineral suppliers sourcing from CAHRAs that are registered with traceability schemes where these are available.
- will seek to ensure its employees, partners, and consultants who are involved in the trading and administration of minerals from CAHRAs are aware of the



contents of the OECD Due Diligence (Annex II) to ensure that the relevant guidance is complied with at all times.

- will seek to ensure employees, partners, and consultants are responsible for escalating any actual or suspected breaches of the OECD Guidance by a supplier to Welsbach's management as soon as he becomes aware of such breach.
- will seek to ensure employees, partners, and consultants trading with counterparties from CAHRAs or a counterparty that sources product from a CAHRA (e.g., any co-operatives or aggregators) must require such counterparty to provide any information and complete the due diligence procedure set out by Welsbach.

### Grievances

Where any interested party wishes to raise concerns on Welsbach or Welsbach's suppliers regarding the circumstances of 3TG Mineral extraction, trade, handling, export in a conflict-affected and high-risk area, please contact [legalnotices@welsbach.sg](mailto:legalnotices@welsbach.sg).

### OECD GUIDANCE

Please refer to the following URL for a copy of the OECD Guidance:  
<https://www.oecd.org/daf/inv/mne/mining.htm>

Singapore, May 1, 2021

A handwritten signature in blue ink, appearing to read "Daniel Mamadou".

Daniel Mamadou  
Chief Executive Officer

A handwritten signature in black ink, appearing to read "Christopher Clower".

Christopher Clower  
Chief Operating Officer