

MMR SUPPLY CHAIN POLICY

09/02/2026

Prepared by: MMR Compliance Department

Document Number: PLPBSP22_014

Board of Directors Approval Date: 30/12/2025

Category: Public

Revision: 2.3

Introduction

Established in 2009 in the Democratic Republic of Congo (DRC), Mining Mineral Resources (MMR) is a leader in the exploration and production of essential minerals such as tin, tantalum, and tungsten. Committed to responsible sourcing, MMR pioneered the introduction of the International Tin Supply Chain Initiative (ITSCI) in the country and upholds compliance with the Organization for Economic Co-operation and Development (OECD) guidelines.

Commitment to Responsible Sourcing

MMR is dedicated to conducting its operations in an ethical and responsible manner. The company fully supports the objectives of Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, which seeks to reduce the connection between mining and conflict in the eastern provinces of the DRC. MMR recognizes the disclosure obligations this law imposes on U.S. Securities and Exchange Commission (SEC) reporting companies.

Supply Chain Engagement and Compliance

MMR sources tin concentrates from its own mining permits, large-scale mining operations, and artisanal mining activities. The company acknowledges the significant economic reliance of thousands of miners and their communities in Conflict-Affected and High-Risk Areas (CAHRAs) on tin production and trade. To ensure responsible and sustainable operations, MMR actively participates in initiatives addressing CAHRA concerns and adheres to the OECD Annex II framework.

MMR will suspend or terminate business relationships with suppliers who provide materials from mines identified under Annex II risks and fail to take corrective action. The company ensures that 100% of its tin production originates from the DRC and maintains a strict policy against conducting business with entities that may directly or indirectly finance armed groups in the region. This measure safeguards against human rights violations linked to conflict minerals.

Traceability and Digital Reporting Systems

MMR ensures complete traceability of all sourced minerals through robust tracking mechanisms, including third-party audits, digital reporting systems, and real-time verification with upstream partners. All mineral sources are continuously monitored to prevent supply chain contamination from illicit sources.

Core Commitments

To uphold ethical sourcing and due diligence, MMR commits to:

- Leading industry efforts to develop and implement practical solutions to responsible mineral sourcing.
- Collaborating with upstream suppliers, partners, subcontractors, government authorities, civil society, and other stakeholders to enhance due diligence and risk mitigation measures.
- Educating and working closely with its supply chain to ensure compliance with MMR's Supply Chain Policy and Code of Conduct and Ethics, which emphasize ethical business principles, human rights, and environmental protection.
- Requiring all partners, subcontractors, and mineral suppliers to adhere to high ethical standards, ensuring that minerals are sourced responsibly.

Due Diligence and Risk Management

MMR has developed and implemented a robust due diligence management system aligned with OECD and United Nations (UN) guidelines. The U.S. Department of State endorses the OECD framework and encourages companies to integrate its principles into their operations.

MMR's due diligence practices include:

- Conducting rigorous assessments of suppliers, material origins, and transit routes in line with the Responsible Minerals Assurance Process (RMAP) standard.
- Complying with government regulations in affected countries while pursuing long-term sustainability initiatives in the global tin mining industry.
- Exploring opportunities to establish industrial-scale mining projects through independent initiatives or joint ventures with private entities and governments in CAHRA regions.
- Continuously improving its policies and performance by addressing grievances through ITSCI and RMAP grievance mechanisms.

MMR employs a structured three-tiered risk management approach:

1. **Identification** - Conducting ongoing supplier audits and risk screenings.
2. **Intervention** - Engaging suppliers in corrective action plans with defined improvement timelines.
3. **Escalation & Termination** - Cutting ties with suppliers who fail to meet compliance requirements despite corrective interventions.

Furthermore, MMR provides an anonymous grievance mechanism accessible to all supply chain stakeholders to report violations, unethical sourcing, or human rights concerns.

Human Rights and ESG Commitments

MMR upholds the highest ethical standards in mineral sourcing, ensuring adherence to:

- **Child Labor and Forced Labor Prevention** - Zero tolerance for any form of child or forced labor, with strict vetting of artisanal mining sources.
- **Fair Wages & Worker Protections** - Ensuring safe working conditions and fair compensation for all supply chain workers.

- **Environmental Responsibility** - Implementing sustainable mining practices, minimizing CO₂ emissions, and reducing ecological impacts through rehabilitation programs and waste reduction strategies.

Compliance with Global Critical Minerals Standards

MMR actively aligns with global standards governing critical minerals, ensuring compliance with:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- U.S. Inflation Reduction Act (IRA) and Section 1502 of the Dodd-Frank Act regarding conflict-free sourcing.
- EU Critical Raw Materials Act and EU Battery Regulation to maintain responsible sourcing eligibility for European markets.

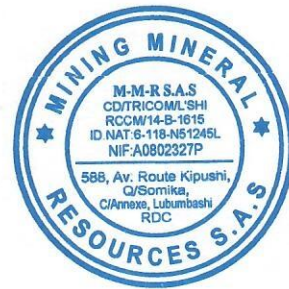
Engagement with Artisanal and Small-Scale Miners (ASM)

MMR supports the formalization of the artisanal and small-scale mining (ASM) sector through:

- **Direct supplier training programs** to enhance ethical mining practices.
- **Fair-trade pricing mechanisms** ensuring economic sustainability for local ASM communities.
- **Safety and compliance workshops** aimed at reducing environmental and health risks in ASM operations.
- **Collaboration with government and industry bodies** to promote transparency and traceability in ASM supply chains.

Conclusion

MMR remains steadfast in its commitment to ethical and sustainable mineral sourcing. By enforcing stringent due diligence measures, collaborating with stakeholders, and adhering to international best practices, the company aims to foster responsible mining while contributing to economic development and stability in the region.



MINING MINERAL RESOURCES SAS

www.mmrdrc.com

588, Avenue Kipushi, Quartier SOMIKA, Commune Annexe,
Lubumbashi

RCCM - CD/LSHI/RCCM/14-B-01615