



Supply Chain Policy

June 15th, 2018

Trade in conflict minerals is a persistent problem in certain African states where mineral wealth has been proven to perpetuate conflict and fuel human rights atrocities.

Blood diamonds are the most notorious example of conflict minerals and gold is well known too. However, less attention surrounded the likes of tin, tantalum, and tungsten, until recent years when the United States, in 2010, introduced the Dodd-Frank Wall Street Reform and Consumer Protection Act which requires manufacturers to audit their supply chains and report conflict minerals usage.

As an international participants in the Tantalum market, PRG Plc and its subsidiaries (herein as PRG) takes its role in the supply chain very seriously. Not only is PRG striving to set new standards of human rights in the mining industry, but it recognises that conflict minerals are of such a serious and shocking nature that they demand a moral and highly ethical response. Therefore, PRG fully supports the position of the Organization for Economic Cooperation and Development (OECD) and the Dodd-Frank Act to avoid use of ores and metals that finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

- In the first instance, it is PRG's fundamental principle that it will only source minerals from conflict free certified mines with full traceability.
- PRG will comply with industry best practices and the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains.
- PRG will work with established agencies and membership organizations such as the RMI to ensure its best practices are audited by independent third parties and provide impartial oversight.
- PRG will further develop methodologies and systems to improve traceability and accountability in the supply chain.
- PRG applies Risk management procedure in aim to minimize the different types of risks within its operations and whole logistics supply chain.
- PRG will not tolerate Human Rights violations, through implementation of Human Rights policy.



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- While sourcing materials, PRG will not tolerate or contribute to any form of abuse or torture. PRG will not by any means profit from, or facilitate the commission by any party, inhumane or degrading treatment.
 - PRG will ensure high level Business ethics standards through Business ethics, Escalation and Anticorruption policy.
 - PRG ensures full compliance with the national and international laws and regulations.
 - As some conflict minerals may also contain radioactive materials, such as thorium and uranium, PRG will require that all shipments falling into the Class 7 category adhere to the appropriate national and international regulatory frameworks.
 - PRG will work with governments, communities, and NGO's, in countries and areas affected by conflict minerals, to develop initiatives and strategies to that with more transparency and accountability in the supply chain whilst lessening the financial and bureaucratic constraints imposed on miners and artisanal workers in the industry.
 - PRG will pursue risk mitigation efforts while continuing trade or temporarily suspending trade, they should consult with suppliers and affected stakeholders, including local and central governmental authorities, international or civil society organizations and affected third parties, where appropriate, and agree on the strategy for measurable risk mitigation in the risk mitigation plan. PRG will draw the suggested measures and indications under the annex II of the Due Diligence Guidelines to design conflict and high risk sensitive strategies for mitigation in the risk management plan and measure progressive improvement.
 - PRG will carry out its own due diligence process in the Logistic supply chain which may include relevant industry recognized bodies such as ITSCI. Furthermore, PRG will publicly report on its supply chain due diligence policies and practices and will expand the scope of sustainability, corporate social responsibility or annual reports to cover additional information in the mineral supply chain due diligence.
 - PRG will report all the findings of the supply chain risk assessment to the designated senior management of the company.
 - PRG is committed to undertake all adequate action in case serious/ severe violation is suspected or detected. The identification and registration of any potential risks or incidents within the upstream and downstream of the logistic supply chain will be properly registered and all the proper measure undertaken.



In the longterm, it is PRG's aim to contribute in a relevant and valuable manner which will have a lasting impact in permanently eliminating the possibility for minerals to fund conflicts.

All employees and stakeholders are encouraged to contact the Compliance Manager, Nadica Stavrova, on ns@prgplc.eu , Tel: +389 2 322 0093, should they have any comments or queries about this Policy requirements.

Chief Executive Officer
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