



**CHEMAF**

**HUMAN  
RESOURCES**


**MINERALS SOURCING POLICY**

**DATE/VERSION**

**24-Jan-20**

**HR-DRC-POL/Jan-2020/0019**

**POLICY OWNER: HUMAN  
RESOURCE**

	<b>MINERALS SOURCING POLICY</b>	Date: 27-Jan-2020	
		Human Resources Department	
		Version : HR-DRC-POL/Jan-2020/0019	Effective Date : 27 <sup>th</sup> Jan 2020

## I. Introduction

At Chemaf, we recognise that the extraction, handling, processing, transportation and trade of minerals has the potential to contribute to, benefit from, or result in significant adverse impacts.

Recognising that we have the responsibility to respect human rights and not contribute to the financing of conflict, we are committed to the responsible sourcing of all minerals we extract, process and supply to our customers and adopt, widely disseminate and incorporate in contracts and/or agreements with mineral suppliers the following policy on responsible sourcing of minerals.

We encourage all mineral suppliers across our supply chain to adopt and implement comparable standards. At a minimum, we require all mineral suppliers to comply with applicable international and laws and regulations of the Democratic Republic of Congo (DRC).

## II. Our expectations for the sourcing of minerals and metals

### ***Regarding serious abuses associated with the extraction, handling, processing, transportation and trade of metals and minerals:***


1. We will not tolerate nor by any means profit from, contribute to, assist with or facilitate the commission of serious abuses by any party of:

- i. any forms of torture, cruel, inhuman and degrading treatment;
- ii. any forms of forced or compulsory labour;
- iii. the worst forms of child labour;
- iv. other gross human rights violations and abuses;
- v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

2. We will immediately suspend or discontinue engagement with suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

### ***Regarding support to non-state armed groups:***

3. We will not tolerate support to non-state armed groups through the extraction, transport, trade, handling or export of metals or minerals.

	<b>MINERALS SOURCING POLICY</b>	Date: 27-Jan-2020	
		Human Resources Department	
		Version : HR-DRC-POL/Jan-2020/0019	Effective Date : 27 <sup>th</sup> Jan 2020

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

***Regarding public or private security forces:***

5. Where identified, we agree to eliminate 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.

6. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.


7. Where we or any supplier contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

8. We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

9. We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

10. We will immediately devise, adopt and implement a risk management plan with suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan.

***Regarding bribery and fraudulent misrepresentation of the origin of minerals:***

	<p style="text-align: center;">MINERALS SOURCING POLICY</p>	Date: 27-Jan-2020	
		Human Resources Department	
		Version : HR-DRC-POL/Jan-2020/0019	Effective Date : 27 <sup>th</sup> Jan 2020

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

***Regarding money laundering:***

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by suppliers.

***Regarding the payment of taxes, fees and royalties due to governments:***

13. We will ensure that all taxes, fees, and royalties related to mineral extraction and trade are paid to governments and we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).


***Regarding risk management of bribery and fraudulent misrepresentation of the origin of metals and minerals, money-laundering and payment of taxes, fees and royalties to governments:***

14. We commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

**If we have reason to believe that the minerals and metals sourcing practices of a supplier are not aligned with this policy or applicable international and DRC laws and regulations, we may seek redress and remove that supplier from Chemaf’s supply chain.**

**III. Implementation**

- Communicate and train relevant Chemaf employees to ensure that they are aware of and responsive to salient social and environmental risks, and are aligned with our aspiration to responsibly produce and source minerals and metals.

	<b>MINERALS SOURCING POLICY</b>	Date: 27-Jan-2020	
		<b>Human Resources Department</b>	
		Version : HR-DRC-POL/Jan-2020/0019	Effective Date : 27 <sup>th</sup> Jan 2020

- Undertake risk based due diligence on our supply chain focusing on those activities in our supply chain where risks to people and the environment are greatest.
- Engage with suppliers to ensure their own policies and procedures are in line with our expectations and commitments outlined in Section II.
- Engage with suppliers to engage with their business relationships to promote the dissemination and adoption of similar standards across the supply chain.
- Regularly review our practices and guidance to ensure that they remain responsive to our assessment of evolving supply chain risks.
- Report on supply chain due diligence where appropriate or required by legislation in our annual Responsibility Report.