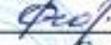


Approved by
Director of OOO "NOK"

 A.N. Fedorov

September 1, 2020

Stamp:

OOO "Novosibiskiy Olovyannyi kombinat"



**Guidelines for responsible supplies of tin-containing
raw materials to Novosibirsk Tin Plant LLC (OOO
"Novosibiskiy Olovyannyi kombinat")**

Validity
from September 1, 2020
until September 1, 2025

1. Application area

1.1 These Guidelines for Responsible Supply of Tin Raw Materials (hereinafter referred to as the Guidelines) describe the Tin raw materials supply chain management system in force at Novosibirsk Tin Plant LLC (OOO "Novosibiskiy Olovyanniy kombinat") (hereinafter referred to as the Enterprise).

1.2 The supply chain management system (hereinafter referred to as the System) was developed based on the Guidelines for Responsible Mineral Import (RMI) (hereinafter referred to as the RMI Guidelines), as well as the regulatory legal acts of the Russian Federation.

1.3 The Guidelines has been developed to ensure reliable selection and assessment of the supplier, to form responsibility and eliminate the risk of direct or indirect support of any conflicts.

1.4 The Guidelines contains:

- the structure and principles of building the System;
- description of supplier identification procedures;
- process for identifying conflict-affected and high-risk areas (CAHRA);
- description of the risk assessment procedure;
- description of the risk mitigation/risk management procedure;
- description of the personnel training process;
- the procedure for annual reporting on the functioning of the System.

1.5 The requirements of the Guidelines apply **to the activities of all employees of the Enterprise**, regardless of the position held, within the framework of the current Policy on the Responsible Handling of Tin-Containing Raw Materials.

2. Terms, definitions and abbreviations

2.1 In this Guidelines, terms are used with the corresponding definitions:

2.1.1 **Responsible person:** The person responsible for the organization and control of the tin-containing raw material supply system, appointed by order of the director of the enterprise.

2.1.2 **Customer questionnaire:** A list of questions sent to the counterparty in order to identify the compliance of its activities with the RMI requirements.

2.1.3 **Counterparty case:** Documents drawn up in one folder and additional information collected by employees of the executing unit about the counterparty.

2.1.4 **Counterparty (customer, supplier):** A legal entity or an individual (individual entrepreneur) that is a party to the contract and supplies tin-containing raw materials.

2.1.5 **Implementing Unit:** Structural unit of the Enterprise, taking part in the collection of information and in the process of supplying tin-containing raw materials.

2.1.6 **Risk Specialist:** An employee of a subdivision of the Enterprise, identifying a counterparty involved in the supply of raw materials, assessing the degree (level) of risk.

2.1.7 **Counterparty information:** Help containing information about shareholders, management structure, financial information, information about the number of employees, etc., compiled using software products of news agencies.

2.1.8 **Due Dilligence (Due diligence in respect of the supply chain):** The research process of forming an objective view, taking into account risks.

3. Organization and principles of building the system

3.1 The Director, by order of the Enterprise, puts into effect the "Guidelines for Responsible Supply of Tin Raw Materials to Novosibirsk Tin Plant LLC", appoints a person responsible for organizing and monitoring the supply system for tin-containing raw materials, an executing unit involved in collecting information and raw materials, as well as a risk specialist with the necessary competence, knowledge and experience to oversee the Due Dilligence process (due diligence in relation to the supply chain).

3.2 The Risk Specialist must meet the following requirements:

- have sufficient qualifications, knowledge, experience and training to conduct a supply chain analysis (higher education, work experience of at least 3 years);
- have the resources necessary to fulfill the relevant duties (software, intellectual and material resources);
- Be able to communicate important information to management, personnel and suppliers.

3.3 The responsibilities of the Risk Specialist include:

- collection of information from employees of the executing unit about counterparties, transactions;
- Counterparty identification;
- assignment of the degree of risk to the counterparty;
- Providing the responsible person with information to prepare an annual report on the compliance of the Supply Chain Management System with the established requirements of the RMI Guidelines and the measures taken.

- Determination of the presence of areas of high risk (CAHRA).
- Identification of risks in the supply chain (red flags)
- at least once a year updating and actualization of information on the above points.

3.4 For implementation purposes, the risk specialist interacts with employees of the executing unit involved in collecting information about counterparties. Employees of the executing unit (even before the conclusion of contracts) for each counterparty specify in which country and in which region of the country the counterparty works, the stability of situation in this area, whether the counterparty is in a zone of military conflict, whether there are cases of human rights violations in the region or cases of corruption.

3.5 Employees of the executing unit inform counterparties about the requirements of the RMI Guidelines by posting it on the official website of the Enterprise, and upon concluding an agreement - by including RMI requirements in the terms of the agreement, as well as sending letters and questionnaires to counterparties (in the form of Appendix 1 or 2). In response, the counterparty sends a completed counterparty questionnaire. An employee of the executing unit must submit all received documents to the Counterparty's Case. The "Counterparty's Case" folder is stored in the office of the executor unit.

3.5.1 Cases of counterparties that carry out transactions with the Enterprise and participate in the supply chain of tin-containing raw materials are reviewed by the employees of the executing unit when concluding a contract for the next period or once a year in order to update the information about the counterparty contained therein. The storage period for documents (the case of the counterparty, documents for each delivery, and all other documents related to the Supplier and its deliveries) is at least 5 years after the expiration of the contract. Cases of counterparties and current information on counterparties are stored in the office premises of the contractor unit.

3.5.2 In case of participation in financial operations (transactions) of third parties, employees of the executing unit are obliged to receive information and documents from the client that allow them to identify and study third parties.

3.6 Employees of the executing unit to determine the presence in the supply chain of any areas of high risk (CAHRA), assess the degree (level) of **risk** of each counterparty involved in the supply chain, when establishing business relations, checks information on the counterparty using available methods, request from the counterparty a package of documents established by paragraphs 3.6.1-3.6.4. Of the Guidelines. Documents are provided in the form of copies certified by the signature of the head (another authorized person) and the seal of the counterparty. **For foreign counterparties, the document must be properly legalized or apostilled, as well as accompanied by a certified translation into Russian.**

3.6.1 **For suppliers of mineral raw materials:**

- the charter in the current edition (with all changes) with the mark of the tax authority on registration;
- the list of members of the company in the current edition;
- certificate of state registration (OGRN);
- certificate of tax registration (INN/KPP);
- production licenses;
- Quota (certificate, license) for production;

documents confirming the powers of the persons signing the agreement (powers of attorney, order of appointment, protocol, decision);

- an extract from the Unified State Register of Legal Entities (EGURL), issued no later than two months on the date of submission to the Enterprise;
- contract of commission, work contract, purchase and sale (if necessary);
- balance sheet for the last reporting period;
- a document confirming the address of the actual location of the office and production areas;
- the counterparty's questionnaire completed in accordance with Appendix «A»;
- documents allowing to identify the route of delivery from the place of extraction of the material to LLC "NOK" (waybills, waybills, route maps, etc.).

- Supply chain due diligence report.

3.6.2 **For suppliers of secondary raw materials:**

- the charter in the current edition (with all changes) with the mark of the tax authority on registration;
- the list of members of the company in the current edition;
- certificate of state registration (OGRN);
- certificate of tax registration (INN / KPP);
- documents confirming the powers of the persons signing the agreement (powers of attorney, order of appointment, protocol, decision);
- an extract from the Unified State Register of Legal Entities (EGURL), issued no later than two months on the date of submission to the Enterprise;
- contract of commission, work contract, purchase and sale (if necessary);
- balance sheet for the last reporting period;

- a document confirming the address of the actual location of the office and production areas;
- the counterparty's questionnaire completed in accordance with Appendix B;
- documents allowing to identify the route of delivery from the place of extraction of the material to LLC "NOK" (waybills, waybills, route maps, etc.).

- Supply chain due diligence report.

3.6.3 For an individual entrepreneur:

- passport;
- certificate of registration with the tax authority;
- certificate of entry into the USRIP (Unified State Register of Private Entrepreneurs);
- extract from USRIP, issued no later than two months on the date of submission;
- information about bank details, postal address, contact numbers;
- a document confirming the address of the actual location of the office and production areas;
- contract of commission, contract, purchase and sale (if necessary).

3.6.4 For foreign counterparties, copies of documents are provided (an extract from the trade register of the country of origin, a certificate, a document confirming the powers of the signatory, other documents recognized as such by the legislation of the country of establishment, citizenship or place of residence of a foreign person (statutory documents), confirming the legal status of a foreign legal entity (individual), citizenship or residence of an individual; location of the headquarters or registration of a person.

3.7 Employees of the executing unit provide the risk specialist with a complete package of documents to assess the degree (level) of risk of each supplier participating in the supply chain, established by paragraphs 3.6.1-3.6.4. Of the Guidelines. All documents identifying the counterparty and its Representative must be valid as of the date of their presentation. In the future, an employee of the executing unit periodically checks the work of the counterparty, at least once a year monitors the political situation in the region where the counterparty is located, monitors the situation for the presence of armed conflicts, human rights violations, cases of harm to people, cases of destruction of civilian objects, cases of conflict with self-government bodies looking at news articles

3.8 The Risk specialist assesses each supplier involved in the supply chain and prepares a counterparty statement according to the following criteria:

- availability of counterparty documents in accordance with clauses 3.6.1-3.6.4 of the Guidelines;
 - presence/absence of suspicious transactions on the part of the supplier during the period of cooperation (Appendix C, E);
 - presence/absence of additional risks (geographic factor, unstable political and economic, epidemiological situation in the production area and the area where the counterparty is located, cases of harm to people, open and hidden armed conflicts, cases of blocking railway and road communications, the state of general security for personnel, destruction civil infrastructure, abuse of entrusted power for personal gain), which should be taken into account when concluding a contract and further work with a counterparty;
 - the presence of claims against the counterparty on the part of the subject of the federation or regional self-government
 - negative reviews about the counterparty in the open media.
 - serious abuse by the counterparty related to the extraction and transportation of minerals
 - a sharp decline in production volumes
 - absence of suppliers and their actual owners (beneficiaries) in government sanctions lists, lists of wanted companies/individuals of money launderers, known fraudsters or terrorists.

3.8.1 A risk specialist, when examining documents, in particular, constituent documents of a legal entity and documents confirming its state registration, in order to study the client, pays special attention to the execution of constituent documents (including all registered changes and additions) of the client and documents confirming the state registration. A risk specialist, in order to study his client, pays special attention to:

- the composition of the founders (participants) of a legal entity, identifying persons who have the ability to influence decision-making by the bodies of a legal entity (beneficiaries);
- the structure of the governing bodies of the legal entity and their powers;
- the amount of the registered and paid authorized (share) capital or the amount of the authorized capital, property;
- the relevance of documents (all documents must be valid on the date of their presentation).

When it is established that his representative is acting on behalf of the client, the risk specialist identifies the representative, verifies his authority, and also identifies and examines the represented client.

3.9 All deliveries of raw materials go through the identification process in accordance with the current instructions (Procedure for identification, acceptance, storage and dispensing of tin-containing raw materials. All information about the counterparty, all operations for the purchase of raw materials from the counterparty, the sale of finished products are subject to monitoring by the employees of the executing unit for compliance with the requirements for due diligence in the supply chain of tin-containing raw materials Information (product identification checklist, acceptance certificate, raw material sampling report) on all suspicious transactions is

transferred to the risk specialist.

3.10 The head of the executing unit conducts training (briefing) of newly hired employees on the following issues:

- the goals and objectives of a comprehensive check of the system of responsible supplies of tin raw materials;
- the current regulations governing the principles of supply chain management (Tin Raw Materials Procurement Policy, Complaints Policy, KYC, CAHRA identification process, supply chain risk assessment process - red flags);
- operations with signs of unusual transactions (Appendix C);
- work with the documents of the counterparty, the formation of the dossier and the case of the counterparty, the procedure and terms of storage of documents, etc.;
- posting information on the website of the Enterprise;
- the basic principles and requirements of the EITI (Extractive Industries Transparency Initiative);
- elimination of the revealed inconsistencies;
- system audit.

The current employees of the departments, depending on the nature of the work, are re-instructed at a frequency of at least once a year. The briefing is confirmed by the employee's signature in the briefing log, the instructor's signature and the date of the briefing.

3.11 Employees of the executing unit strive to strengthen relationships with counterparties through the following measures:

- the contracts include provisions of a practical guide on the compliance of suppliers and customers with the principles and procedures of RMI;
- information support of counterparties is carried out in order to ensure that their activities comply with the goals and principles of the RMI Guidelines.
- periodic written exchange of information

3.12 If the counterparty violates the principles of the RMI Guidelines, an employee of the executing unit notifies the risk specialist, who, in turn, documents information about the counterparty and the operation in respect of which there are suspicions, and submits the information to the responsible person (in the form of a memo), who, on the terms observance of confidentiality sends a message to RMI, certified by the signature of the responsible person and certified by the seal of the Enterprise.

3.13 In order to ensure a reliable supply chain and prevent violations of the RMI principles, the Enterprise takes general security measures:

- packaging of each batch of goods in a special container MKR (flexible intermediate bulk container) with mandatory individual marking, preventing opening or seizure of the contents, and in the case of delivery in blocks or ingots - individual marking (stamp) on each unit
- physical separation of individual consignments of goods until the completion of their verification and confirmation of acceptance;
- involvement of persons not involved in a particular conflict of interest in the assessment of consignments of goods;
- notification of a risk specialist (and, if necessary, a representative of the System management) about all identified violations and inconsistencies;
- in case of repeated problems with the same supplier, the violation is documented and measures are taken to terminate cooperation.

4. Identification of conflict-affected and high-risk areas in the supply chain (CAHRA)

Identification of conflict-affected areas and high-risk areas in the supply chain (CAHRA) is carried out in accordance with accepted OECD and RMI standards. The company uses information resources covering the areas of conflict, governance and human rights, and which are recognized throughout the world - Appendices "E" and "H". Evaluation of transactions with counterparties is carried out in accordance with Appendix E ". Wherein:

4.1. When evaluating transactions with counterparties, the risk officer takes into account:

- Is the supplier's geographic location the CAHRA country of origin;
- Is the transportation of tin-containing raw materials from conflict zones or high-risk areas;
- Index of observance of human freedoms;
- The degree of conflict, serious and gross violations of human rights;
- Use of payment systems (official banking and informal systems);
- The level of involvement of criminal organizations (resources of the Rosfinmonitoring portal (<https://portal.fedsfrn.ru>) - a constantly updated List of organizations and individuals in relation to which there is information about their involvement in extremist activity or terrorism)
- The level of corruption;

- The level of environmental threat.

4.2. The Risk Officer conducts a study of current and potential suppliers, whose activities may be associated with risk factors, by:

- Counterparty identification in accordance with clauses 3.6. - 3.8.1 of this Manual;

- Identification of material in accordance with clause 3.9 of this Guide;

- Verification of documents on transactions.

- Monitoring information on tin mining enterprises

- Identification of signs of unusual transactions with tin-containing raw materials, which may be associated with conflicts or serious violations in the field of extraction, transportation and (or) trade - Appendix C of this Guide.

4.3. Based on the results of the analysis, the risk specialist determines whether the country / region of the supplier, as well as the transit of tin-containing raw materials, is CARHA or not.

4.4. The enterprise categorically does not cooperate with countries and / or regions designated as CARHA, including **Uganda, Rwanda, DRC, CAR, South Sudan, Zambia, Angola, Republic of Congo, Tanzania, Burundi**. And also with countries located in conflict-affected and high-risk areas. (CAHRA) in accordance with Article 14.2 of the European Union Regulation on Conflict Minerals 2017/821.

4.5. In case of suspicion of non-compliance with measures to counter terrorism and fraud, any employee of any division of the Company on an anonymous basis sends information to the mailing address rmi.nok@mail.ru, or a mailbox located on the territory of the Company in an accessible place. The monitoring of the received messages and calls is carried out by a risk specialist and double-checks the information received. Further actions are carried out in accordance with clause 3.12 of this Guide.

5. Identifying red flags and assessing supply chain risks.

5.1. The purpose of this step is to collect and analyze information in order to identify and warn about risks, potential or actual adverse impacts on the supply chain. This is achieved through a reasonable effort to identify red flags.

Red flags - are risks associated with the origin and transportation of material, the involvement or interest of the supplier or its individual employees in any actions related to the transportation, trade of materials from / or through the CAHRA regions.

The OECD risk indicators (red flags) related to the origin, transit and suppliers of tin raw materials, in accordance with the OECD guidelines for tin, tantalum and tungsten, are:

5.1.1. Tin raw materials are known to originate from, or have been transported through CAHRA;

5.1.2. Tin raw materials are said to be sourced from a country that has limited known reserves, probable resources or levels of expected production of the minerals in question (i.e., declared quantities of minerals from that country do not match its known reserves or expected production levels);

5.1.3. Tin raw materials claimed to originate from a country known to be a transit country for materials from CAHRA areas (legal or illegal).

5.1.4. The suppliers of the company have an interested person or other interests in companies that supply or transit minerals from the above mentioned places.

5.1.5. It is known that the suppliers of the company or other extractive companies during the last 12 months received minerals from their places of extraction or transit specified in paragraph 5.1.1. - 5.1.4.

For RMAP assessment purposes, only "Low" or "High" risk areas are considered in accordance with Appendix «F» of the Guidelines.

5.2. On the basis of the documents collected about the supplier, a "Certificate of the counterparty" is formed, including:

- information about the Supplier (questionnaire, collected information from various sources, identified signs of unusual transactions with tin-containing raw materials, which may be associated with conflicts or serious offenses in the field of production, transportation and (or) trade);

- information about the supplied material (identification of the material, its origin);

- determination of the route of movement and transportation of material (description of the route, drawing up schemes and maps of movement).

5.3. Based on the information specified in clause 4, the identification of "red flags" in the supply chain and risk assessment - Appendix «F» of the Guidelines are carried out.

5.4. If the identification process identifies high-risk red flags, additional steps are taken to mitigate the risk and remove the red flag - Appendix «G».

5.5. After collecting and clarifying information in accordance with Appendix «G», red flags are re-identified and risk assessment in accordance with Appendix «F». After that, work is carried out to develop and implement measures to reduce and manage risks.

6. Development and implementation of measures to reduce risks / risk management.

In order to mitigate the adverse consequences, the Company has developed measures based on internationally accepted general principles, standards and procedures for reliable supply chain management, namely:

6.1. The company considers all the information gathered to develop a strategy to respond to identified risks and implements a risk management plan that is consistent with the policy, the type and extent of risk and the Company's position in the area of responsible procurement of tin raw materials.

6.2. If the risk is within the area of responsibility of our company, we take effective measures to reduce the risk on our own, through in-depth risk analysis with the involvement of the necessary specialists, preparation and implementation of a corrective action plan and risk management.

6.3. If the risk is directly related to the activities of the supplier, depending on the degree of risk, the following actions are possible -

6.3.1. "Low level of risk":

-continuation of cooperation and consultation of the supplier on the possibility of reducing risks;

6.3.2. "High" level of risk":

- temporary suspension of interaction with the supplier (s), whose activities (s) are associated with risk factors, against the background of the continuation of measures to reduce the risks that can be estimated;

- termination of cooperation with suppliers whose activities are associated with risk factors. If they do not use means of risk mitigation and (or) if such means are inappropriate and (or) unacceptable from the standpoint of analyzing the costs and benefits and opportunities of the Company.

Risk Level	Control mechanism
Low	Initiating or continuing cooperation while mitigating potential consequences of identified risks.
High	Suspension of cooperation with a simultaneous reduction of identified risks by collecting additional information confirming or refuting the possibility of adverse consequences of risks. OR Termination of interaction with suppliers characterized by the presence of risk factors and/or sources of risk.

7. System audit

7.1. Internal audit.

In order to verify compliance with and fulfillment of the requirements of the Guidelines for Responsible Supply of Tin Raw Materials to Novosibirsk Tin Plant LLC, including the due diligence system, the Company conducts an internal audit at least once a year.

To conduct an internal audit, by order of the Company, a commission is created consisting of:

-Chairman of the Commission: Deputy General Director for Production.

-Members of the Commission: a person responsible for the organization and control of the tin-containing raw material supply system, a risk specialist.

The internal audit checks:

1. Fulfillment of the requirements of the Guidelines for Responsible Supply of Tin-Containing Raw Materials to Novosibirsk Tin Plant LLC during the reporting period.

2. Completeness of filling out the cases of counterparties participating in the supply system of tin-containing raw materials, established by clauses 3.6.1-3.6.4. "Guidelines for the responsible supply of tin-containing raw materials to Novosibirsk Tin Plant LLC"

3. Assessment of the degree (level) of risk assigned to each counterparty.

4. Organization of a training (briefing) system for both newly hired employees and existing employees in accordance with clause 3.10 of the Guidelines for Responsible Supply of Tin-Containing Raw Materials to Novosibirsk Tin Plant LLC.

5. Mechanism for considering complaints received, results of their consideration.

If during the audit it becomes clear that a dangerous situation or problem may develop, a corrective action plan is developed to improve the due diligence system, which includes the following steps:

- documenting the problem;

- limitation of the problem area, temporary settlement;

- investigation of the root cause of the problem;

- to propose a solution to the problem, which will allow to avoid the recurrence of the problem in the future, or to eliminate the cause of the problem;

- determination of the terms of elimination, responsible persons, and terms of re-evaluation of the proposed measures and actions;

Based on the results of the audit, a report is drawn up, which contains an analysis of the observance and implementation of the requirements of the "Guidelines for Responsible Supply of Tin Raw Materials to Novosibirsk Tin Plant LLC", proposals for improving the management system and the due diligence system of the Enterprise.

The management of the enterprise, represented by the Director, holds a final meeting to consider the submitted report, following the results of which an order is issued approving the submitted report and a plan of corrective actions to eliminate the identified deficiencies and improve the system of responsible supplies of tin-containing raw materials, including the due diligence system at the Enterprise.

The order and the final report are published on the company's website.

7.2. External audit.

For the purpose of an independent analysis that allows to determine the conformity and efficiency of the System, compliance with the requirements of the RMI standards, an external audit is carried out at the Enterprise annually. The following indicators are checked during the audit:

- the adequacy of the methods and measures of the Enterprise aimed at implementing the recommendations contained in the practical RMI Guide;

- availability of adequate external and internal means of risk reduction;

- adherence to the recommendations contained in the practical RMI Guide, in all types of interaction with suppliers of tin-containing raw materials;

- ensuring the safety of tin-containing raw materials, the availability of an effective system for tracking information on all types of activities of the Enterprise;

- continuous risk assessment and timely response to the situation based on the results of such an assessment.

The results of the audit, analysis of information and proposals for improving the management system and the due diligence system are transmitted to the top management of the enterprise in the form of a final report. The company's management, represented by the Director, Deputy Director, Head of the Commercial Service and a risk specialist, analyzes the information provided in the report and corrective actions, on the basis of which an order is prepared approving the submitted report and the corrective action plan. The final report and order are published on the company's website.

A company conducting an audit of a tin trading business must meet the following criteria:

- be accredited by RMI and be included in the list of recommended RMI auditors.
- independence from the Enterprise in respect of which the audit is performed;
- absence of a conflict of interest between the auditor and the Enterprise in respect of which the audit is performed (business or financial relationship);
- inadmissibility of providing the audited Enterprise with any other services in connection with the examination of compliance, except for general recommendations on this issue;
- the competence required to conduct such an audit.

The external audit process includes the following operations:

- preparation for the audit: development of the plan;
- on-site check with a visit;
- consultations with a group of specialists of the Company engaged in risk assessment;
- completion of the audit: justification, documentation and a report on the results obtained, indicating the level of compliance of the audited Enterprise with the RMI recommendations during the examination of the conformity of supply chains;
- providing the Company with recommendations for improving the methods of conducting the examination of conformity;

A summary audit report should be included in the Enterprise's annual supply chain compliance review report.

8. Annual reports

The responsible person annually prepares and submits to RMI a report on the compliance of the Supply Chain Management System with the established requirements of the RMI Guidelines and the measures taken.

9. Responsibility and control

9.1 Responsibility for the fulfillment of the requirements of this Guidelines is borne by the heads of the structural divisions of the Enterprise involved in interaction with counterparties in the process of supplying raw materials, and carrying out their identification.

9.2. Control over the fulfillment of the requirements of this Guidelines is carried out by the person responsible for the organization and control of the tin-containing raw material supply system.

**Appendix «A»
(required)**

Counterparty questionnaire (RMI)

1. COUNTERPARTIE's DETAILS				
Name				
Legal address				
Location address				
Phone number				
If the company is listed on a stock exchange, indicate the name of the exchange				
Web site				
External auditors				
Does the company have branches or subsidiaries (please list)				
2. COMMERCIAL ACTIVITIES				
Kind of activity		<input type="checkbox"/> -Bank <input type="checkbox"/> -Sales of jewelry <input type="checkbox"/> -Trade in secondary raw materials <input type="checkbox"/> -Broker / Dealer <input type="checkbox"/> -Trading precious metal coins <input type="checkbox"/> -Monetny yard <input type="checkbox"/> -Other financial intermediary <input type="checkbox"/> -Industrial enterprise <input type="checkbox"/> -Wholesale <input type="checkbox"/> -Other _____		
3. BENEFICIARIES SHAREHOLDERS WITH A SHARE OF MORE THAN 25%				
Share of participation%	Name/full name	Adress	Country of incorporation/ Citizenship	Establishment/Birth Date

4. FINAL BENEFICIARY (MORE THAN 25% - FOR INDIVIDUALS ONLY)

Share of participation%	Name/full name	Address	Citizenship	Birth Date

5. MANAGEMENT STRUCTURE

	Full name	Position	Citizenship	Birth Date
Board of Directors				
Senior executives				

6. FINANCIAL INFORMATION

6.1. Financial statements

	Currency	Last reporting period (year)
Share (authorized) capital		
Final balance		
Volume of sales		
Net income		

Please submit a copy of the latest annual report

5.2 Other financial information

Production financing source	<input type="checkbox"/> - Equity capital	
	<input type="checkbox"/> - Government organizations, indicate name(s) _____	
	<input type="checkbox"/> - Bank loan	
	<input type="checkbox"/> - Loans of third parties	
What payment method is used for settlements with suppliers?	Payment type	Share (%)
	Bank transfers	
	Receipts	
	Cash	

7. LABOR RESOURCES

Number of employees in the company	
Number of employees in the Group	
8. ORIGIN OF TIN CONCENTRATE	
Country (countries) of origin of tin concentrate supplied to the Company	
Countries of destination for processed tin concentrate	
11. COUNTERING THE LEGALIZATION OF PROCEEDINGS AND THE FINANCING OF TERRORISM (AML (anti-money laundering)/ CFT (counter-terrorist financing))	
Has your organization approved a compliance program that includes AML/CFT policies and procedures in accordance with domestic and international laws, rules and standards?	<input type="checkbox"/> - Yes, please provide a copy <input type="checkbox"/> - No
12. RESPONSIBLE TIN SUPPLY MANAGEMENT	
Has your company adopted a Responsible Tin Supply Chain Policy from Conflict Affected and High Risk Areas that is consistent with the standards set out in the policy model set out in Annex II of the OECD Guidelines for Responsible Supply Chain Responsibility for Minerals from Conflict Affected Areas? and high risk areas http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf	<input type="checkbox"/> - Yes, please provide a copy <input type="checkbox"/> - No
Does your organization comply or is planning to comply with the OECD Due Diligence Guidelines for Responsible Supply Chain Management from Conflict-Affected and High Risk Areas	<input type="checkbox"/> - Complies <input type="checkbox"/> - Is planning to comply <input type="checkbox"/> - No
Does your organization adhere to the following industry programs: <input type="checkbox"/> - (RJC Chain of Custody Standard) <input type="checkbox"/> - (Conflict Free Smelter Program) <input type="checkbox"/> - Other, please specify _____ _____ _____ _____	Additional comments:
What procedures are in place to ensure that purchased tin ore concentrates were not used to finance the conflict?	
13. ANTI-BRIBERY POLICY	
Does your organization have an anti-bribery policy?	<input type="checkbox"/> - Yes, please provide a copy <input type="checkbox"/> - No

Has the Company, or its senior management, been charged with any country in the world for violating anti-corruption laws?	<input type="checkbox"/> - Yes, please describe <input type="checkbox"/> - No
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Signature: _____

I hereby declare that the information provided above is true and accurate as of the date of signing.

	Authorized person with the right to sign	Authorized person with the right to sign
Full name:		
Position:		
Company:		
Place and date		

**Appendix «B»
(required)**

Counterparty questionnaire (RMI)

1. COUNTERPARTIE's DETAILS				
Name				
Legal address				
Location address				
Phone number				
If the company is listed on a stock exchange, indicate the name of the exchange				
Web site				
External auditors				
Does the company have branches or subsidiaries (please list)				
2. COMMERCIAL ACTIVITIES				
Kind of activity		<input type="checkbox"/> -Bank <input type="checkbox"/> -Sales of jewelry <input type="checkbox"/> -Trade in secondary raw materials <input type="checkbox"/> -Broker / Dealer <input type="checkbox"/> -Trading precious metal coins <input type="checkbox"/> -Monetny yard <input type="checkbox"/> -Other financial intermediary <input type="checkbox"/> -Industrial enterprise <input type="checkbox"/> -Wholesale <input type="checkbox"/> -Other _____		
3. BENEFICIARIES SHAREHOLDERS WITH A SHARE OF MORE THAN 25%				
Share of participation%	Name/full name	Adress	Country of incorporation/ Citizenship	Establishment/Birth Date

4. FINAL BENEFICIARY (MORE THAN 25% - FOR INDIVIDUALS ONLY)				
Share of participation%	Name/full name	Address	Citizenship	Birth Date
5. MANAGEMENT STRUCTURE				
	Full name	Position	Citizenship	Birth Date
Board of Directors				
Senior executives				
6. FINANCIAL INFORMATION				
6.1. Financial statements				
	Currency	Last reporting period (year)		
Share (authorized) capital				
Final balance				
Volume of sales				
Net income				
<i>Please submit a copy of the latest annual report</i>				
5.2 Other financial information				
Источник финансирования добычи	<input type="checkbox"/> - Собственный капитал <input type="checkbox"/> - Государственные организации, укажите название(я) <hr/> <input type="checkbox"/> - Банковский кредит <input type="checkbox"/> - Кредиты третьих лиц			
Какой метод оплаты используется для расчетов с поставщиками?	Тип оплаты		Доля (%)	
	Банковские переводы			
	Чеки			
	Наличные			
7. LABOR RESOURCES				
Number of employees in the company				
Number of employees in the Group				
8. ORIGIN OF TIN CONCENTRATE				

Country (countries) of origin of tin concentrate supplied to the Company	
Countries of destination for processed tin concentrate	
9. TECHNICAL FACILITIES (EQUIPMENT)	
Does the Company have smelting or processing facilities	
Does the Company have production facilities	
What types of metals does the Company plan to send for processing	
<input type="checkbox"/> - _____ <input type="checkbox"/> -Other, specify _____	
10. RESPONSIBLE TIN SUPPLY MANAGEMENT	
Has your company adopted a Responsible Tin Supply Chain Policy from Conflict Affected and High Risk Areas that is consistent with the standards set out in the policy model set out in Annex II of the OECD Guidelines for Responsible Supply Chain Responsibility for Minerals from Conflict Affected Areas? and high risk areas http://www.oecd.org/daf/inv/mne/GuidanceEdition2.pdf	<input type="checkbox"/> - Yes, please provide a copy <input type="checkbox"/> - No
Does your organization comply or is planning to comply with the OECD Due Diligence Guidelines for Responsible Supply Chain Management from Conflict-Affected and High Risk Areas	<input type="checkbox"/> - Complies <input type="checkbox"/> - Is planning to comply <input type="checkbox"/> - No
Does your organization adhere to the following industry programs: <input type="checkbox"/> - (RJC Chain of Custody Standard) <input type="checkbox"/> - (Conflict Free Smelter Program) <input type="checkbox"/> - Other, please specify _____ _____ _____	Additional comments:
What procedures are in place to ensure that purchased tin ore concentrates were not used to finance the conflict?	
11. COUNTERING THE LEGALIZATION OF PROCEEDINGS AND THE FINANCING OF TERRORISM (AML / CFT)	
Has your organization approved a compliance program that includes AML / CFT policies and procedures in accordance with domestic and international laws, rules and standards?	<input type="checkbox"/> - Yes, please provide a copy <input type="checkbox"/> - No
12. ANTI-BRIBERY POLICY	

Does your organization have an anti-bribery policy?	<input type="checkbox"/> - Yes, please provide a copy <input type="checkbox"/> - No
Has the Company, or its senior management, been charged with any country in the world for violating anti-corruption laws?	<input type="checkbox"/> - Yes, please describe <input type="checkbox"/> - No

13. DATA PROTECTION POLICY

Does the organization have a data protection policy?	<input type="checkbox"/> - Yes <input type="checkbox"/> - No
Does the organization have a designated data protection officer?	<input type="checkbox"/> - Yes <input type="checkbox"/> - No
Does the organization have a certified storage or information system?	<input type="checkbox"/> - Yes <input type="checkbox"/> - No

13.1. SUPPORT FOR DUE DILIGENCE BY METAL SUPPLIERS

Organization	YES	NO	N/A
Does the Company have a specialist (controller) responsible for all issues related to AML/CFT (due diligence, AML policies, internal training)? If yes, please provide his full name, phone number and email address.			
Does the company verify compliance with AML/CFT requirements by an independent auditor or government agencies?			
Does the Company have programs for training employees on AML / CFT			
How long the company stores information (documents) related to due diligence..			

13.2. DUE DILIGENCE ON METAL SUPPLIERS

Describe your suppliers

<input type="checkbox"/> - Legal entity (%_____)	
<input type="checkbox"/> - Individual (%_____)	

What type of information does the Company request from its suppliers

Legal entities	YES	NO	Individuals	YES	NO
Name of the company	<input type="checkbox"/>	<input type="checkbox"/>	Full name	<input type="checkbox"/>	<input type="checkbox"/>
Address	<input type="checkbox"/>	<input type="checkbox"/>	Address	<input type="checkbox"/>	<input type="checkbox"/>
Registration address	<input type="checkbox"/>	<input type="checkbox"/>	Birth date	<input type="checkbox"/>	<input type="checkbox"/>

Country of registration	<input type="checkbox"/>	<input type="checkbox"/>	Citizenship	<input type="checkbox"/>	<input type="checkbox"/>
Extract from the Unified State Register of Legal Entities	<input type="checkbox"/>	<input type="checkbox"/>	Copy of passport or other identity document	<input type="checkbox"/>	<input type="checkbox"/>
Beneficial owners	<input type="checkbox"/>	<input type="checkbox"/>	Beneficial owners	<input type="checkbox"/>	<input type="checkbox"/>
Source of origin of metals	<input type="checkbox"/>	<input type="checkbox"/>	Source of origin of metals	<input type="checkbox"/>	<input type="checkbox"/>
Description of core business and financial information	<input type="checkbox"/>	<input type="checkbox"/>	Supplier profile (activity, income, etc.)	<input type="checkbox"/>	<input type="checkbox"/>
Does the Company have a risk assessment procedure for metal suppliers? (e.g. low, medium, high risk)					
Does the Company verify that metal suppliers and their operations are on the list of persons, organizations or countries issued by state / competent authorities					
Does the company follow due diligence procedures for high-risk metal suppliers?					
Does the Company assess metal suppliers in relation to their AML/CFT procedures and practices and their procurement procedures and practices?					
13.3. Monitoring operations	YES	NO	N/A		
Does the Company have a program to monitor unusual and potentially suspicious activity, including, for example, transfers of funds and monetary instruments (such as traveller's checks) or payments to third parties?					
What method of payment does the Company usually use when settling with metal suppliers?					
Payment type		Процент 9%)			
Bank transfer					
Receipt					
Cash					
If mandatory reporting is required when making transactions with cash, does the Company have a procedure to identify transactions structured in such a way as to circumvent these requirements?					
14. MONITORING OF OPERATIONS WHEN PURCHASING ONLY FROM INDIVIDUALS					
	YES	NO	N/A		
Does the Company keep statistics on purchases of metals from individuals to identify suspicious transactions?					
Does the Company have a special procedure for a transaction with an individual if this amount significantly exceeds the amount of the average transaction If "yes", please comment					
Is the Company able to verify that an individual does not carry out multiple transactions simultaneously for the sale / purchase of a small					

<p>amount of metal, which add up to a significant amount (smirfing)? If "yes", then in which way?</p> <p>_____</p>			
--	--	--	--

Signature: _____

I hereby declare that the information provided above is true and accurate as of the date of signing.

	Authorized person with the right to sign
Full name:	
Position:	
Company:	
Place and date	

Appendix «C» (required)

C.1 A list of the main signs of unusual transactions with tin-containing raw materials, which may be associated with conflicts or serious offenses in the field of extraction, transportation and/or trade.

1. Unmotivated refusal to provide the client with information (in addition to the established regulatory documents), but requested in accordance with the established practice, including about his principal (in the case when the client acts as a representative of a legal entity or individual) or beneficiary, as well as unnecessary client's concerns about confidentiality in relation to the transaction being carried out.
2. The presence of non-standard or unusually complex schemes in the order of settlement, which differ from usual market practice.
3. The client's offer to return the amount due under a canceled transaction either to third parties, including to an account with a non-resident bank, or to his account in a bank other than the bank from which the funds were originally received for the transaction.
4. Introduction of additions and amendments to the operation (deal) that do not comply with established practice.
5. Unreasonable haste in the operation, which the client insists on.
6. The introduction by the client into the previously agreed scheme of the operation (transaction) immediately before the start of its implementation of significant changes regarding the direction of cash flow.
7. The transfer by the client of an order to carry out the operation through a representative (intermediary), if the representative (intermediary) fulfills the client's order without entering into direct (personal) contact with the Enterprise.
8. Difficulties arising in the verification of the information provided by the client, unjustified delays in the provision by the client of documents and information on the operation (transaction), the submission by the client of information that cannot be verified or this verification is too expensive.
9. Inability to establish the client's counterparties.
10. The client's insistence on making payments in cash.
11. Use of accounts opened in various credit institutions for settlements under one agreement.
12. A participant in an operation with monetary funds or other property is registered in a state or territory that provides a preferential tax regime for taxation and (or) does not provide for disclosure and provision of information when conducting financial transactions (offshore zone), or his account is open in a bank registered in a specified state or in a specified territory.
13. The client's unmotivated demand to terminate the contract and/or return the money paid by the client before the actual operation.
14. Making settlements between the parties to the transaction using the settlement accounts of third parties, through unofficial banking systems, using cash.
15. Lack of obvious connection between the nature and type of activity of clients with the services for which the client turns to the Enterprise.
16. Confusing or unusual nature of the transaction that has no obvious economic sense or obvious legitimate purpose.
17. Inconsistency of the transaction with the goals of the organization, established by the constituent documents of this organization.
18. Identification of repeated performance of operations or transactions, the nature of which gives reason to believe that the purpose of their implementation is to evade the mandatory control procedures provided for by the Federal Law.
19. Transfer, on behalf of the client, funds for the sold tin-containing raw materials to the accounts of third parties.
20. Deviation of the cost of tin-containing raw materials under the agreement by more than 20 percent upward or downward from the level of market prices.

C.2 Indicators of unusual transactions that may be aimed at financing terrorism.

1. A participant in an operation (transaction), as well as a beneficiary in an operation (transaction), is a person excluded from the List of organizations and individuals in relation to whom there is information about their involvement in extremist activity or terrorism (hereinafter - the List). The List is compiled and maintained by the Federal Financial Monitoring Service in accordance with the Decree of the Government of the Russian Federation dated January 18, 2003 No. 27 "On approval of the Regulation on the procedure for determining the list of organizations and individuals in relation to which there is information about and involvement in extremist activity or terrorism, and this list to the attention of organizations carrying out operations with monetary funds or other property".
2. The participant in the operation (transaction), as well as the beneficiary and beneficial owner of the operation (transaction), is a close relative of a person included in the List or excluded from it.

3. The registration address (location or place of residence) of the participant in the operation (transaction), beneficiary under the operation (transaction) coincides with the registration address (location or place of residence) of the person included in the List or excluded from it.
4. Operations with monetary funds or other property, performed by a person who was re-included in the next edition of the List prior to its re-inclusion in the List.
5. The participant in the operation (transaction), as well as the beneficiary and the beneficial owner of the operation (transaction) has, respectively, registration, place of residence or location in a country/region/subject with a high degree of risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and fighting.
6. Making settlements for an operation (transaction) using Internet technologies, electronic payment systems, alternative money transfer systems or other systems of a remote format to (from) a country/region/subject with a high risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and hostilities.
7. Operations on the expenditure of funds by Russian public organizations and associations (religious organizations, political parties, organizations, associations) and foundations that do not correspond to the purposes stipulated by their constituent documents.
8. Operations on the expenditure of funds by Russian branches of representative offices of foreign non-profit non-governmental organizations that do not correspond to the stated goals.
9. Operations for the receipt and expenditure of funds by foreign non-profit non-governmental organizations, public associations, political parties and religious organizations and foundations, as well as their branches and representative offices operating on the territory of the Russian Federation.
10. Operations with the participation of heads, founders or employees (if such information is available) of public organizations and associations (religious organizations, political parties, organizations, associations), foundations, foreign non-profit non-governmental organizations, their branches and representative offices operating on the territory of the Russian Federation.
11. The declared origin of tin-containing raw materials from a country or territory of the Russian Federation, in which reserves or potential undeveloped reserves are known, or the expected production volume of these raw materials is small (i.e., the declared volumes from this territory exceed its known reserves and (or) potential production volumes);
12. Declared tin-containing raw materials obtained from recyclable materials / scrap or mixed sources and processed in a country through which, as far as is known or suspected, transit from conflict or high risk zones.
13. The supplier and other companies engaged in production and processing operate in one of the risky territories associated with origin or transit, or have shareholders or other persons from the above territories that are financially interested in their activities:
14. Other criteria and features at the discretion of the Enterprise.

**Appendix «D»
(required)**

Identification of suspicious transactions carried out by the counterparty

Refusal to provide information by the client (in addition to those established by legal documents)	<input type="checkbox"/> YES <input type="checkbox"/> NO
The presence of non-standard or unusually complex schemes in the order of calculations	<input type="checkbox"/> YES <input type="checkbox"/> NO
The client's offer to return the amount due under the canceled transaction to third parties	<input type="checkbox"/> YES <input type="checkbox"/> NO
Unreasonable haste in the operation, which the client insists on	<input type="checkbox"/> YES <input type="checkbox"/> NO
Submitting by the client of significant changes concerning the direction of movement of funds or metals	<input type="checkbox"/> YES <input type="checkbox"/> NO
Unable to install client counterparties	<input type="checkbox"/> YES <input type="checkbox"/> NO
Use of accounts opened with various credit institutions or with third parties for settlements under one agreement	<input type="checkbox"/> YES <input type="checkbox"/> NO
Cash settlements	<input type="checkbox"/> YES <input type="checkbox"/> NO
The client's unmotivated demand to terminate the contract and/or return the money paid by the client before the actual operation	<input type="checkbox"/> YES <input type="checkbox"/> NO
Lack of obvious connection between the nature and nature of the client's business with the services for which the client turns to the Company	<input type="checkbox"/> YES <input type="checkbox"/> NO
Deviation of the value within the framework of the contract by more than 20% upward or downward from the level of market prices	<input type="checkbox"/> YES <input type="checkbox"/> NO
The transaction participant is registered in a territory that does not provide for the disclosure and provision of information when conducting financial transactions	<input type="checkbox"/> YES <input type="checkbox"/> NO

<p>A participant in an operation is a person in relation to whom there is information about their involvement in extremist activity or terrorism, or in relation to his close relatives</p>	<p><input type="checkbox"/> YES</p> <p><input type="checkbox"/> NO</p>
<p>The participant in the operation (transaction), as well as the beneficiary and the beneficial owner of the operation (transaction) has, respectively, registration, place of residence, or location in a country/region/subject with a high risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and military.</p>	<p><input type="checkbox"/> YES</p> <p><input type="checkbox"/> NO</p>
<p>Settlements for an operation (transaction) using Internet technologies, electronic payment systems, alternative money transfer systems or other systems of a remote format to/from a country/region/subject with a high degree of risk of terrorist and extremist manifestations, interethnic conflicts, armed clashes and military action.</p>	<p><input type="checkbox"/> YES</p> <p><input type="checkbox"/> NO</p>
<p>Operations on the expenditure of funds by Russian public organizations and associations, Russian branches and representative offices of foreign non-profit non-governmental organizations that do not correspond to the stated goals</p>	<p><input type="checkbox"/> YES</p> <p><input type="checkbox"/> NO</p>
<p>The declared origin of tin, tin ore from a country or territory of the Russian Federation, in which the known reserves or potential undeveloped reserves or the expected volume of their production are small</p>	<p><input type="checkbox"/> YES</p> <p><input type="checkbox"/> NO</p>

Appendix «E»

IDENTIFICATION OF ZONES OF CONFLICT AND HIGH RISK AREAS (CAHRA)

Supplier name _____

Supplier location _____

Country of origin of material _____

The country through which the material is transported* _____

Assessment of the level of conflict of the country of origin and countries of transport

No	Assessment criterion	Source of information for assessment	Assessment by criteria
	1	2	3
1	Whether the country of origin of the material or the country of transit is subject to the Dodd-Frank Act	The Dodd — Frank Act	yes – 1 no – 0
2	List of conflict-affected and high-risk zones. (CAHRA) in accordance with Article 14.2 of the European Union Conflict Minerals Regulations 2017/821	https://www.cahaslist.net/	yes – 1 no – 0
3	Existence of an active or latent armed conflict	https://hiik.de/	«Wars», «Limited wars» – 1 «Violent crisis», «Non- violent crisis», «Dispute», «Non cconflict» - 0
4	Human freedom observance index	https://www.cato.org/human-freedom-index-new	>7 – 1 <7 - 0
5	Information on serious and gross violations of human rights	https://www.ohchr.org/RU/Pages/Home.aspx	yes– 1 no – 0
6	Terrorism Index (Potential Support and Development of Terrorist Groups)	https://www.visionofhumanity.org/maps/global-terrorism-index/	>6 – 1 <6- 0
7	Environmental threat level	https://www.visionofhumanity.org/maps/ecological-threat-register/	>5 – 1 <5 – 0
8	Corruption level	https://www.transparency.org/en/countries/	<40 – 1 >40– 0

Notes:

*- if the material in the process of delivery from the country of origin moves through the territory of other countries - the assessment is made for each country

**- if total assessment on the sum of assessment of all criteria ≥ 1 (it is more or equally 1), then the estimated country or the region is CAHRA

Final Country/Region Assessment **: CAHRA / not CAHRA

date

signature

Appendix «F».
SUPPLY CHAIN RISK ASSESSMENT (red flags)

No	Risk indicator	Risk Assessment (LOW/HIGH)
	1	2
1	Availability of a complete list of documents according to KYC.	No – HIGH Yes - LOW
2	The inspection established the submitted documents, including the supplied tin-containing raw materials, correspond to reality	No – HIGH Yes - LOW
3	The audit carried out established the presence of at least one of the criteria specified in paragraphs. 3.8, 3.8.1. "Guides".	Yes - HIGH No - LOW
4	Material originates from or has been transported through CAHRA).	Yes – HIGH No - LOW
5	Tin raw materials claimed to originate from a country known to be a transit country for materials from CAHRA areas (legal or illegal).	Yes – HIGH No - LOW
6	Tin raw materials are said to be sourced from a country that has limited known reserves, probable resources or levels of expected production of the minerals in question (i.e., declared quantities of minerals from that country do not match its known reserves or expected production levels	Yes – HIGH No - LOW
7	The material is shipped from a country where the declared delivery quantities do not correspond to known stock.	Yes – HIGH No - LOW
8	The supplier or his partner associated with the supply of the material has stakeholders or interests in companies that supply materials from CAHRA or countries with a low stock of supplied material	Yes – HIGH No - LOW
9	It is known that in the last 12 months a supplier or a company associated with the supply of the material received material from the countries specified in clauses 2.1. 5.1.1. -5.1.5. Section 5, as well as clause 4.4. Section 4 of the Guidelines	Yes – HIGH No - LOW
10	The presence of confirmed complaints or appeals regarding violations by the counterparty of the principles of the RMI Guidelines	Yes – HIGH No - LOW

***- If a HIGH level of risk is identified at any one of the points, the supply chain is assigned a HIGH level of risk.**

RISK LEVEL (Underline whatever applicable)

LOW, HIGH

Risk Specialist

_____ (signature)

_____ (full name)

Appendix "G".

Comprehensive measures and actions to reduce the level of risks in the supply chain

1. Availability of a complete list of documents according to KYC.

Action: If the Counterparty provided an incomplete list of required documents, or provided complete information, an additional request is sent with the requirement to provide the necessary documents and information.

2. Material originates from or has been transported through CAHRA.

Action: The Counterparty requests a due diligence due diligence report from our organization, arranges a visit to the Counterparty's mine / mine / plant, or agrees to conduct an independent audit of the Counterparty.

3. The Material originates from a country known to have or through it (legally or illegally) supplied material from CAHRA.

Action: The Counterparty requests a due diligence due diligence report from our organization, arranges a visit to the Counterparty's mine / mine / plant, or agrees to conduct an independent audit of the Counterparty.

4. The material is shipped from a country where the declared delivery rates do not correspond to known stocks.

Action: The Counterparty is asked for documents confirming the extraction of material from the declared sources - official exploration reports, or other documents that can reliably confirm the reserves.

5. He supplier or his partner associated with the supply of material has interested persons or interests in companies that supply materials from CAHRA or countries with a low stock of supplied material/

Action: A due diligence due diligence report is requested from the Counterparty with the involvement of our organization, a visit to the Counterparty's mine / mine / plant is arranged. Additionally, the Counterparty is requested to provide a complete list of transactions carried out over the last 12 months, with a decryption of the complete supply chain.

6. It is known that the supplier or company associated with the supply of the material, in the last 12 months received material from the countries indicated in the list of risk indicators.

Action: The Counterparty is requested to provide a complete list of transactions carried out over the last 12 months, with a decryption of the complete supply chain.

7. Does the country support the EITI (Extractive Industries Transparency Initiative)

Action: The Counterparty is requested to submit an EITI Compliance Report

8. The presence of complaints or appeals regarding the supply of the counterparty

Action: An in-depth analysis of existing complaints and appeals regarding the Counterparty and its supplies is carried out. If the requests are of a critical nature, or the risks identified by the results of the request have not been eliminated, a joint analysis is carried out with the Counterparty and a set of measures is developed to reduce the elimination of the cause of the risk, or reduce it to an acceptable

Appendix «H»

List of open sources of information

Assessment question	Coating	Open sources	Content of sources
CONFLICT	Global	Analytical sources	
		Heidelberg Conflict Barometer http://www.hiik.de/?lang=en/	Analysis of the latest global conflict events in the form of texts and graphics; individual regional and individual heads of country.
		Geneva Academy of the Rule of Law in Armed Conflict http://www.rulac.org/	Database and analytical reports on the application of international law in armed conflict around the world (global coverage and briefs).
		Assessment Opportunities Project - Global Emergency Overview https://www.acaps.org/countries/	World map and country analysis providing an overview and analysis of countries in a “situation of concern”, “humanitarian crisis” and “severe humanitarian crisis”.
		Maps or tables	
		Uppsala Conflict Data Program - Georeferenced Event Dataset http://www.ucdp.uu.se/ged/	An interactive map of organized violence events based on news sources; including deaths, type of violence (state, non-state, unilateral), the user can zoom in to the level of unique events.
		CrisisWatch http://www.crisisgroup.org	The state of game in the most important global conflict / potential conflict situations; an interactive map and database that allows assessing the situation in individual countries for 2003-2018.
		Global World Index http://www.visionofhumanity.org	An interactive map that measures the global world in terms of qualitative and quantitative indicators (security personnel and police, political instability, organized conflict, military personnel, etc.).

		Major episodes of political violence http://www.systemicpeace.org	Maps and tables listing, for example, episodes of armed conflict (including victims) in the world from 1946 to 2017.
	Regional	Place of armed conflict and event data http://www.acleddata.com/	Reports and analysis of conflict trends, including monthly updates on political violence in Africa, the Middle East and Asia based on real-time data, as well as analysis of current and historical dynamics in specific states.
		International World Information Service - Conflict Map http://ipisresearch.be/	Maps of the Democratic Republic of the Congo (conflict /conflict minerals), Central African Republic, Sudan and South Sudan (disputed territories, incidents, natural resources, education, community violence, intra- and interstate violence); map analysis provided.
		International Tin Association https://www.internationaltin.org/ http://www.itsci.org/	The Tin Supply Chain Initiative (iTSCi) provides safety assessment reports for mines in Rwanda, the eastern provinces of the Democratic Republic of Congo, Burundi and Uganda.
		Mining conflicts in Latin America http://ejatlas.org/featured/mining-latam	The Atlas of Environmental Justice documents and catalogs social conflicts around environmental issues for contextual information.
GOVERNANCE	Global	Global governance indicators http://info.worldbank.org/governance/wgi	Dataset of updated aggregated and individual governance indicators for specific countries, six dimensions of governance; Country reports summarize indicators by countries.
		Brittle States Index http://ffp.statesindex.org	An index focused on risk indicators based on news articles and reports..
		Corruption Perceptions Index http://www.transparency.org/research/cpi/overview	Country Perceived Corruption Index.
		National Institute for Resource Management https://resourcegovernance.org/	Country information and comparative analysis of issues related to natural resource management..

HUMAN RIGHTS	Global	UN Security Council (UNSC) resolutions http://www.un.org/en/sc/documents/resolutions	UNSC Resolutions provide a useful description of the political and security situation in countries of concern on an annual basis.
		UN Human Rights Council http://www.ohchr.org/EN/HRBodies/HRC/Pages/AboutCouncil.aspx	Universal periodic reviews..
		Office of the United Nations High Commissioner for Human Rights http://www.ohchr.org/EN/pages/home.aspx	Country-specific information on human rights issues.
		United Nations Development Program - International Human Development Indicators - Country Profiles http://hdr.undp.org/en/countries	Annual country reports on human rights practice in specific countries, global coverage.
		Amnesty international https://www.amnesty.org/en/countries/	
		Global witness https://www.globalwitness.org/en-gb/	
		Human Rights Watch https://www.hrw.org/	
		Mines and communities http://www.minesandcommunities.org/	News articles and analysis of global mining and its consequences; classified by topic, country, company, minerals.
MINERAL RESOURCES AND EXTRACTION	Global	British Geological Survey https://www.bgs.ac.uk/mineralsuk/statistics/worldStatistics.html	Country reports on international statistics and information on minerals.
		United States Geological Survey http://minerals.usgs.gov/minerals/pubs/country/	Country reports on international statistics and information on minerals.
		EU Raw Material Information System http://rmis.jrc.ec.europa.eu/	Information on extraction, trade flows and raw material policies.

