



Limited liability company
NOVOSIBIRSK TIN PLANT
(OOO "Novosibiskiy Olovyanniy kombinat")
OOO "NOK"

Reliability, Responsibility, Quality since 1942

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Policy of Novosibirsk Tin Plant LLC for the supply of tin-containing raw materials

Novosibirsk

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This Policy on the procurement of tin-containing raw materials is intended to serve as a general guideline for all participants throughout the supply chain of tin-containing raw materials.

The company LLC "Novosibirsk Tin Combine" (LLC "NOK"), the city of Novosibirsk, Novosibirsk region, Russian Federation, is a manufacturer of tin products:

- vintage tin,
- babbits,
- solders.

The quality of our products is recognized both in the Russian and international markets.

Honesty is one of the main values of our company. We adhere to the highest standards of ethical and socially responsible behavior and do not tolerate human rights violations related to the extraction, transportation or trade of conflict minerals.

The policy of our company is to refuse to use "conflict minerals" in its production, to exclude the risk of direct or indirect support of any conflicts, by ensuring a reliable selection and evaluation of the supplier, tracking the entire supply chain of tin-containing raw materials.

We observe high standards of combating money laundering, tax evasion, combating the financing of terrorist practices, preventing abuses related to the extraction, transportation, sale of tin-containing raw materials, direct or indirect support of non-state armed groups,

state or private security forces, bribery and deliberate distortion of any information about the origin of the purchased tin ore raw materials.

The main raw material used for the production of tin products at our enterprise is tin concentrate, the purchases of which we treat with special care. According to the company's current policy, we completely exclude the possibility of using tin concentrates that were mined, traded, processed, exported or transported to areas affected by the conflict, as well as high-risk regions, recognizing that we are responsible for observing human rights and do not contribute to the conflict.

We support the implementation of the principles and criteria of the Extractive Industries Transparency Initiative (EITI).

We refrain from any actions that contribute to the financing of the conflict, responsibly comply with the relevant UN resolutions on sanctions and domestic legislation, if it ensures the implementation of such resolutions.

We control all incoming and currently in production raw materials, for each delivery made to us from the moment of its extraction at the mining enterprise and until the moment of receipt at the combine. We monitor the process of moving raw materials in real time using specialized Internet services.

Each supply of material is identified and documented, the technological process of production is monitored and documented, inventory of raw materials, WIP and finished products is kept, we investigate any identified deviations and non-compliance.

We recognize the risks that may be associated with the extraction, trade, processing and export of minerals from conflict-affected and high-risk areas. We recognize the need to respect and respect human rights and not contribute to the emergence and development of conflicts.

We undertake to accept, widely disseminate and include in contracts and / or agreements with suppliers this policy and any other documents related to the responsible selection of suppliers of raw materials from conflict-affected and high-risk areas.

We undertake to refrain from any actions that contribute to the financing of the conflict, and we undertake to comply with the relevant UN and Russian resolutions.

Serious violations for us are:

1. Serious abuses related to the extraction, transportation or trade of minerals:
 - 1.1. All forms of torture, cruel, inhuman and degrading treatment;
 - 1.2. All forms of forced or compulsory labor;
 - 1.3. All forms of illegal child labor;

- 1.4. Other gross human rights violations and abuses, such as widespread sexual violence;
- 1.5. War crimes and other serious violations of international humanitarian law, crimes against humanity and genocide.

2. Direct or indirect support for non-State armed groups (this includes direct or indirect financing of armed groups and providing them with advantages).

3. Direct or indirect support of public or private security forces.

4. Bribery and fraudulent origin of minerals (money laundering, non-payment of taxes, fees and royalties to governments).

The company's management guarantees the avoidance of purchases of non-certified and conflicting raw materials by the following methods:

1. Refusal to purchase or accept for processing all types of tin-containing raw materials originating from any of the following countries: Uganda, Rwanda, DRC, CAR, South Sudan, Zambia, Angola, Republic of the Congo, Tanzania, Burundi, as well as from other countries, regions and areas in which a high risk will be identified, as well as the transit of tin-containing raw materials through the countries listed above.

2. Purchase of tin raw materials directly from miners and producers on the domestic Russian market.

3. Due diligence of existing and future suppliers, monitoring and evaluation of the entire supply chain of tin-containing raw materials:

- * KYC-knowing your supplier;

- * CAHRA identification Procedure;

- * Supply chain risk assessment;

- * Implementation of risk reduction / risk management measures in accordance with paragraph 6 of the Guidelines for Responsible Supply of Tin-containing Raw Materials.

4. Oblige all its suppliers of tin raw materials to comply with the requirements for excluding "conflict minerals" in their production facilities, including by including this obligation in the contract for the purchase and/or processing of raw materials. Also, LLC " NOK " reserves the opportunity to visit the deposits in order to control the process of extraction and production of shipped tin raw materials.

5. Provide and expect from their suppliers, employees of the company, buyers of products information about due diligence within the chain of "non-conflict minerals", to confirm the absence of support for conflicts.

6. We immediately suspend interaction with a supplier whose supplies have a high level of risk, while working with the supplier to reduce the level of risk to a reasonable level or eliminate it. If it is not possible to reduce the risk level, work with the supplier is terminated.
7. With regard to bribery and fraudulent misrepresentation of the origin of raw materials, we will not offer, promise, give or demand any bribes and will resist extortion of bribes for the purpose of concealing the origin of tin-containing raw materials, misleading taxes, fees paid to governments for the purposes of mining, trade, transportation and export.
8. With regard to money laundering: We will support efforts and take steps to promote the effective elimination of money laundering that is associated with the extraction, production, processing, transportation and export of tin-containing raw materials, as well as obtained from illegal trafficking and extortion in mines and mines, on roads or in places where minerals were sold during the year by supplying companies.
9. With respect to the payment of taxes and fees due to Governments: We guarantee that all taxes and duties on the extraction of tin-containing raw materials, trade and exports from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we undertake to disclose such payments in accordance with the principles set out in the Extractive Industries Transparency Initiative.
10. In managing the risks of bribery and fraud, misrepresentation of information about the origin of tin-containing raw materials, money laundering, non-payment of taxes, fees and deductions to governments: We commit to working with suppliers, central and local authorities, international organizations, civil society, and affected third parties, as necessary, to improve and monitor effectiveness in order to prevent or reduce the risks of adverse impacts through measurable steps taken within a reasonable time frame. We will suspend or terminate interaction with suppliers after unsuccessful attempts to reduce risks.

NOK LLC is interested in a long-term, reliable and open partnership with both suppliers of tin-containing raw materials and consumers of finished products. The work carried out by NOK LLC supports the efforts of international organizations to prevent the spread of conflict minerals from conflict zones and high-risk zones, contributing to the observance of human rights in conflict-prone countries and regions.

We are committed to working only with those companies that share our values. We undertake to inform our suppliers about this policy and require them to apply a similar policy to their own supply chain.

Director of OOO "NOK"



Fedorov A.N.