

Fenco Group Ltd's Responsible Minerals Sourcing Policy

Purpose

At Fenco Group Ltd, we are committed to responsible sourcing of minerals to ensure ethical, legal, and sustainable practices throughout our supply chain. We recognize the risks associated with minerals that originate from conflict-affected and high-risk areas and seek to mitigate any adverse impacts linked to their extraction, trade, handling, and export.

Scope

This policy applies to all suppliers, subcontractors, and partners involved in the sourcing, processing, and supply of minerals used in our products. It aligns with internationally recognized frameworks, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Commitment to Ethical Sourcing

Fenco Group Ltd commits to:

- Avoid sourcing minerals that finance armed conflict or contribute to human rights abuses, including child labour and forced labour.
- Conduct thorough due diligence on the origin and chain of custody of minerals used in our products.
- Require suppliers to provide full transparency regarding their mineral sourcing practices.
- Support responsible mining initiatives and programs that promote ethical and sustainable extraction methods.
- Comply with all applicable laws and regulations related to conflict minerals, such as the Dodd-Frank Act and EU Conflict Minerals Regulation.

Due Diligence

Process To uphold our commitments, we implement a risk-based due diligence approach that includes:

- Identifying and assessing risks in our mineral supply chain.
- Engaging with suppliers to ensure compliance with responsible sourcing standards.
- Requiring suppliers to complete due diligence reports and provide evidence of sourcing from conflict-free smelters and refiners.
- Taking corrective action when suppliers are found to be non-compliant with this policy.

Supplier Expectations

We expect our suppliers to:

- Adhere to our responsible minerals sourcing requirements.
- Conduct due diligence on their own supply chains and provide necessary documentation upon request.
- Source from validated conflict-free smelters and refiners.
- Cooperate with our audits and assessments to ensure policy compliance.

Continuous Improvement

We are committed to continuous improvement in our responsible sourcing efforts by:

- Regularly reviewing and updating our policy and practices to align with evolving regulations and industry standards.
- Engaging with stakeholders, including NGOs, industry groups, and governments, to promote responsible mineral sourcing.
- Providing training and guidance to our employees and suppliers on responsible mineral sourcing.

Reporting and Grievance Mechanism

We encourage stakeholders, including employees and suppliers, to report concerns related to mineral sourcing through our grievance mechanism. Reports can be made anonymously and will be investigated in accordance with our compliance procedures.

Conclusion By implementing this Responsible Minerals Sourcing Policy

Fenco Group Ltd aims to uphold ethical business practices, mitigate supply chain risks, and contribute to a more sustainable and responsible minerals trade. We expect our suppliers and partners to share our commitment and work collaboratively toward responsible sourcing.



Signed _____ Name: Eugene Buchner Date: 24/03/2025