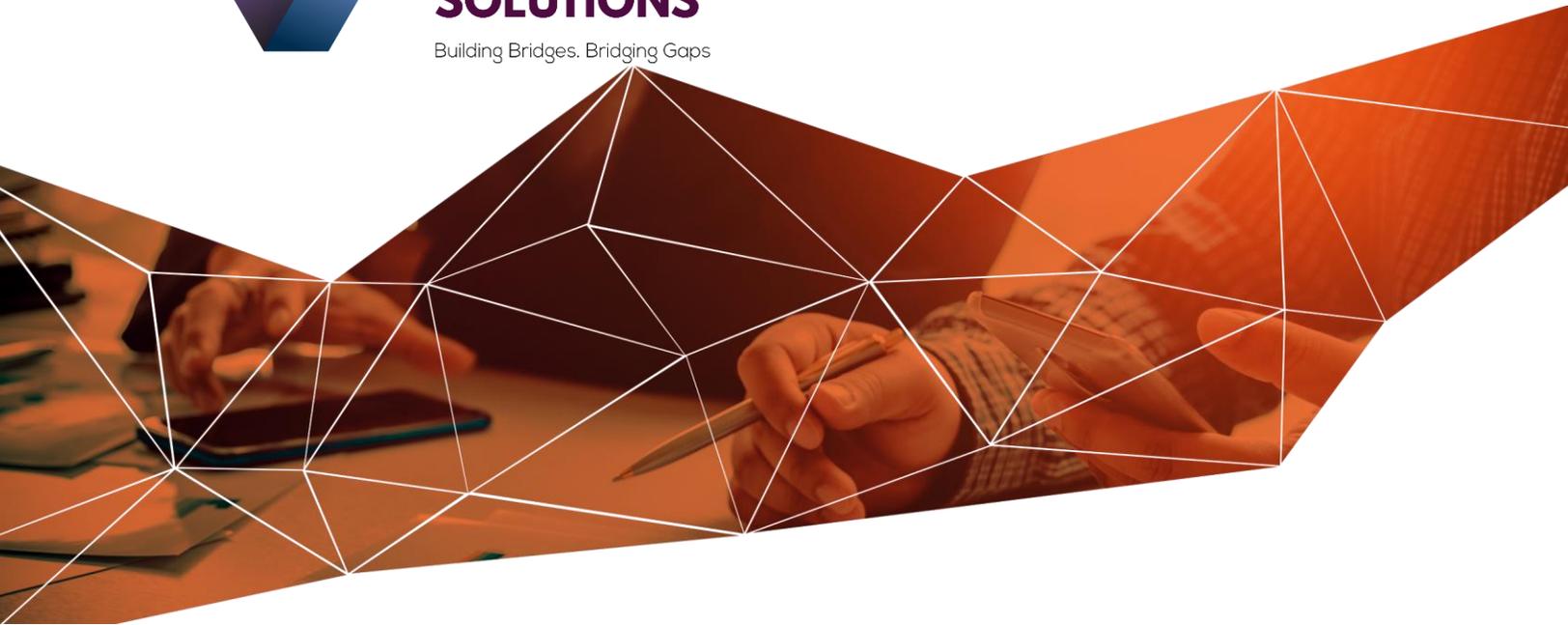




**GLOBAL
DYNAMIC &
INNOVATIVE
SOLUTIONS**

Building Bridges. Bridging Gaps



GDIS SARL CONFLICT MINERALS





GDIS SARL CONFLICT MINERALS POLICY

Developed by management

Preamble

Aware of our social and environmental responsibility, the GDIS SARL Cooperative reaffirms its commitment to promote fair and ethical trade in the mineral resources it exploits in the province of Haut Lomami, in the greater Katanga, Democratic Republic of Congo. This policy is in line with our cooperative charter and our core values of solidarity, transparency and sustainable development.

1. DEFINITIONS AND TERMS OF REFERENCE

1.1 Definitions

- **Conflict Minerals** : Minerals whose trade could directly or indirectly contribute to the financing of armed conflicts, human rights abuses or corruption. This term refers in particular to the "3TG" (Tin, Tantalum, Tungsten, Gold) from the Democratic Republic of Congo (DRC) and neighboring countries, designated as "conflict or high-risk areas".
- **Conflict Zones** : Areas where mining is associated with human rights violations, as defined by the United Nations.
- **Responsible supply chain** : All the processes, activities and actors involved in the processing of minerals, from their extraction to their integration into our finished products.
- **Due Diligence**: The continuous, proactive and reactive process by which we identify, assess and mitigate risks in our supply chain.
- **Countries covered**: In accordance with Dodd-Frank legislation (Section 1502) and the EU Conflict Minerals Regulation, this policy applies to minerals from the DRC, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South

Effective Date: January 1, 2025

Review Date: November 31, 2026

Distribution: All departments, key suppliers, community leaders.





Sudan, Tanzania, Uganda, Zambia and any other countries designated as conflict zones.

1.2 Regulatory framework

This policy aligns with:

- Regulation (EU) 2017/821 on conflict minerals
- Dodd-Frank Act (Section 1502)
- UN Security Council Resolutions 1952 (2010) and 2360 (2017)
- OECD Due Diligence Guidelines

2. FUNDAMENTAL PRINCIPLES

2.1 Ethical Commitment

GDIS SARL is committed to:

- Do not buy any minerals from conflict zones
- Supporting peace and development initiatives in the Great Lakes region
- Promoting responsible artisanal mining practices

2.2 Compliance

- Full compliance with the EU Conflict Minerals Regulation
- Application of ITSCI and RMI standards
- Collaboration with local and international authorities
- Strict compliance with local and regional laws

3. IMPLEMENTATION MECHANISMS

3.1 Traceability System

GDIS SARL in its quest to set up and implement traceability, a clear and simple procedure has been put in place to:

- **Identification** : Comprehensive supply chain mapping
- **Audit** : Independent Third-Party Audit of Extraction Sites
- **Documentation** : Certificates of Origin for each lot

Effective Date: January 1, 2025

Review Date: November 31, 2026

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3.2 Due Diligence

5-step process according to OECD guidelines:

1. **Establishing strong management systems**
2. **Risk identification and assessment**
3. **Risk prevention and mitigation**
4. **Independent verification**
5. **Reporting transparent**

3.3 Audit Program

- Annual on-site audits
- Training suppliers in responsible practices
- Establishment of an internal oversight committee

4. COMMITMENT TO THE DRC

4.1 Support for Local Development

GDIS SARL is committed to:

- Contribute 2% of its mineral-related turnover to community development programs
- To support artisanal mining cooperatives certified "conflict-free", by strengthening their technical, organizational and financial capacities in order to promote responsible and sustainable production.
- Participate in initiatives to formalize the artisanal mining sector, in collaboration with local and national authorities, communities and specialized organizations, to improve working conditions, safety and transparency.
- Promote responsible mining practices, including the reduction of environmental impacts, the prevention of child labour and respect for human rights within mining communities.

4.2 Strategic Partnerships

- Collaboration with the Congolese government (SAEMAP)
- Partnership with the Climate Resilient Artisanal Mining (CRAFT) initiative
- Active member of the Responsible Minerals Initiative (RMI)

Effective Date: January 1, 2025

Review Date: November 31, 2026

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5. COMPLIANCE MECHANISM AND MONITORING

5.1 Governance Structure

- **Ethics Committee** : Ensures the continuous monitoring of the implementation of the policy, examines the risks related to minerals from sensitive areas and validates the recommendations resulting from the audits. It ensures integrity, transparency and compliance with international standards.
- **Compliance Officer** : Designated focal point, responsible for the day-to-day monitoring of compliance obligations, collecting information from suppliers, and updating due diligence files. He coordinates actions between the different departments and ensures the proper application of corrective measures.
- **Internal Audit** : Conducts quarterly audits to assess the effectiveness of the internal control system, identify any irregularities and propose improvements. Audit reports are shared with management and the Ethics Committee to ensure rigorous follow-up.

5.2 Non-Conformance Management

GDIS SARL implements a rigorous system to identify, treat and prevent any non-compliance related to responsible sourcing:

- **Defined escalation process:** Any non-compliance is immediately reported to the Compliance Department, then forwarded to the Ethics Committee when the risk is deemed critical. Escalation levels shall be established to ensure a rapid, consistent and proportionate response to the severity of the breach.
- **Immediate suspension of non-compliant suppliers:** In the event of a proven violation or high risk, GDIS SARL applies to the temporary or permanent suspension of the supplier. This measure is accompanied by an official communication specifying the reasons, the requirements for possible reinstatement and the deadlines granted.
- **Transparent investigation of violations:** Each incident is the subject of a documented investigation including evidence collection, root cause analysis and impact assessment. The findings are shared with the Management and the Ethics Committee and may be communicated to stakeholders when required.

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TRAINING AND AWARENESS

6.1 Training Program

- Mandatory annual training for all employees: Sessions covering due diligence requirements, conflict minerals risks, and individual responsibilities.
- Quarterly Supplier Workshops: Capacity building on traceability, compliance, required documentation and good practices of the responsible mining sector.
- Conflict minerals educational materials: Provision of guides, factsheets and visual aids explaining risks, regulatory obligations and internal procedures.

6.2 Stakeholder Engagement

- Regular dialogue with local communities
- Collaboration with local and international NGOs
- Seamless communication platform

7. Reporting and Transparency

7.1 Mandatory Reporting

- Annual Report on Conflict Minerals (SEC Compliant)
- EU Declaration of Conformity
- Sustainability Report

7.2 Public Communication

- Publication of reports on our website
- Semi-annual information meetings
- Publicly available complaint mechanism

8. Review and Continuous Improvement

8.1 Policy Review

- Mandatory annual review: The policy is reviewed annually to ensure that it remains relevant, effective and aligned with the organization's due diligence objectives.
- Feedback-based adjustments: Feedback from audits, stakeholders, employees, and suppliers is integrated to strengthen procedures, address gaps, and improve implementation.

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Review Date: November 31, 2026

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- Alignment with regulatory developments: The policy is updated based on new national laws, international standards (OECD, RMI, etc.), and industry requirements to ensure ongoing compliance.

8.2 Performance Indicators

- Supplier Compliance Rate: A measure of the percentage of suppliers that meet all due diligence requirements and ethical standards set by GDIS SARL.
- Number of audits completed: Indicator of the level of control applied on a quarterly basis, including internal and external audits and site visits.
- Investments in local communities: Monitoring of financial and material resources devoted to community programs in education, health, infrastructure and empowerment.

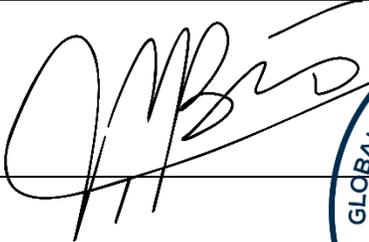
9. REFERENCES

1. Regulation (EU) 2017/821 - Conflict minerals
2. Loi Dodd-Frank Wall Street Reform - Section 1502
3. OECD Due Diligence Guidance
4. United Nations Guiding Principles
5. ITSCI Standards - Traceability System

Approval

Done in Lubumbashi, 27 November 2025

For the GDIS SARL

Grace LUSE MBUYI	
CEO	
Signature 	



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