DUE DILIGENCE POLICY

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SOMIKA is a metal mining company that strives to improve occupational health and safety policy. The company aims to prevent all incidents and accidents during its operations in a reasonably practical way and strives to minimize the hazards and implement required control measures associated with the Copper & Cobalt supply chain including raw material & finished goods transportations. We will widely disseminate and incorporate the following policy into contracts and/or agreements with suppliers on responsible sourcing copper & cobalt from our owned mines and treatment units.

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Somika commits to refraining from any action which contributes to the financing of conflict and commits to complying with relevant UN sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Regarding serious abuses associated with the extraction, transport, or trade of minerals.

While sourcing from, or operating in, conflict-affected and high-risk areas, Somika will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:

- Any forms of torture, cruel, inhuman, and degrading treatment.
- Any forms of forced or compulsory labour.
- The worst forms of child labour.
- Other gross human rights violations and abuses such as widespread sexual violence.
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Regarding risk management 1 of serious abuses

will immediately suspend or discontinue engagement with upstream suppliers where it identifies a reasonable risk that the upstream supplier is sourcing from, or linked to, any party committing serious abuses as defined in above paragraph.

Regarding direct or indirect support to armed groups

Somika will not tolerate any direct or indirect support to armed groups through the extraction, transport, trade, handling, or export of minerals, which includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, armed groups or their affiliates who:

- Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;2 and/or
- Illegally tax or extort3 money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- Illegally tax or extort intermediaries, export companies or international traders.

Regarding risk management of direct or indirect support to armed groups

Somika will suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to armed groups.

Regarding public or private security forces

Somika agrees to eliminate direct or indirect support to public or private security forces that illegally control mine sites, transportation routes and upstream actors in the supply chain, that illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded or that illegally tax or extort intermediaries, export companies or international traders.

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

DUE DILIGENCE POLICY

Where Somika. or any of its partners contracts public or private security forces, these forces will be engaged in accordance with domestic law and the Voluntary Principles on Security and Human Rights, with a particular focus on screening to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses are not hired.
Somika will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions to improving transparency, proportionality and accountability in payments made to public security forces for the provision of security. This might include forming or utilizing stakeholder committees at the local and provincial level.
Somika will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups to adverse impacts associated with the presence of public or private security forces on mine sites

Regarding risk management of public or private security forces
Somika will suspend engagement with the upstream supplier until such time as the risk of direct or indirect support to public or private security forces or activities that are likely to be at variance with the aims of above paragraphs is eliminated.

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

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

Regarding the payment of taxes, fees, and royalties due to governments
Somika will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflictaffected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, will disclose such payments in accordance with the principles set forth under the Extractive Industry
Transparency Initiative (EITI) and in line with commitments made by the government of DRC to the EITI as an EITI candidate country.

Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, and payment of taxes, fees, and royalties to governments
Somika commits to engage with upstream suppliers, central and local governmental authorities, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. If, following an additional risk assessment undertaken by (or on behalf of) SOMIKA. there is no significant measurable improvement, SOMIKA will suspend engagement with any upstream supplier contributing to the risk until such time as the risk is eliminated. If it becomes clear that the risk cannot or will not be eliminated, SOMIKA will discontinue business with that upstream supplier. Depending on the nature and magnitude of the risk, SOMIKA may also choose to immediately suspend business prior to working with the upstream supplier to We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

Human rights
Somika supports the principles of the United Nations Universal Declaration of Human Rights, and we are committed to upholding these principles in our policies, procedures and practices. Respect for human rights is and will remain integral to our operations. We will endeavour to work with business partners who conduct their business in a way that is compatible with our policies of respect for human rights and ethical conduct. We will work with customers to ensure that contractual requirements do not infringe human rights.

DUE DILIGENCE POLICY

We will take measures to ensure that the work of our employees does not compromise internationally accepted human rights conventions, whilst recognizing and respecting the diversity in local cultures across the different areas in which we operate.

The environment
We will conduct our business with respect and consideration for the environment. We will strive to minimize our environmental impact through the management of waste, vehicle emissions and energy consumption.

Local communities
Somika is fully committed to supporting and assisting the communities in which we operate through a variety of means including charitable fund-raising, sponsorship of community projects and voluntary work by employees. We conduct our business with respect and consideration for the good of local communities, taking steps to minimize any disturbance as a result of our operations. We will also serve local interests by providing good employment opportunities and effective services and products.

Responsible supply chain of minerals from conflict-affected and high- risk areas
Somika recognizes that we have a responsibility to respect Human rights and not contribute to conflict. We commit to adopt, widely disseminate, and incorporate in contracts and/or agreements with suppliers the policy on responsible sourcing of minerals from conflict-affected and high-risk areas, from the point of extraction to the end user. We commit to refrain from any action which contributes to the financing of conflict and commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Voluntary Principles on Security and Human Rights
The VPSHR principles provide a short, concise outline of actions companies should take to assess risks and implement public and private security measures in a manner that respects human rights. SOMIKA. will oversee the implementation of the VPSHR principles on all our operations including participation in meetings to plan, coordinate, and cooperate on all activities required.

Bribery and corruption
Somika is resolutely opposed to bribery and corruption in whatever form it may take. Gifts or entertainment may only be offered to a third party if they are consistent with customary business practice in the relevant territory, are modest in value and cannot be interpreted as inducements to trade. Where there is doubt, guidance should be sought from the t Regional Human Resources, Regional Finance Director or Regional Managing Director. No financial or other inducements should be given to third party organizations or to individuals from such organizations in any circumstances, including government agencies and representatives. Sales of the Company's services and products and purchases of products and services from suppliers will be made solely on the basis of quality, performance, price, value and/or for the benefit of the Group, and never on the basis of giving or receiving inducements in the form of payments, gifts, entertainment or favours or in any other form. Employees should not accept gifts, money or entertainment from third party organizations or individuals where these might reasonably be considered likely to influence business transactions. Gifts, other than trivial ones with a low value, should be returned. In a culture where such an action might cause offence, the gift should be declared to the company and, if practical, donated to an appropriate charity.

Political contributions
Somika does not make contributions to political parties and this policy should be followed by all operations. The only exceptions to this are where there is a legal requirement to do so or where there is an established, lawful and generally accepted practice to do so. In such circumstances, any payment must be approved by the General Manager or the relevant Managing Director.

Compliance with Legal Requirements
Somika will comply fully with all relevant Lega Requirement (National and international laws) and will act in accordance with local guidelines and regulations, including those which are industry specific, governing our operations. It is the responsibility of all managers to ensure, by taking legal or other expert advice where appropriate, that they are aware of all local laws and regulations which may affect the area of the business in which they are engaged, including tax and exchange controls.

DUE DILIGENCE POLICY

Accounting standards and records

All accounting documentation must clearly identify the true nature of business transactions, assets and liabilities in conformity with relevant regulatory, accounting and legal requirements. No record or entry may be false, distorted, incomplete or suppressed. All Group reporting must be accurate and complete and in compliance in all material respects with accounting policies and procedures. Employees must not materially miss-state or knowingly misrepresent management information for personal gain or for any other reason. It may be required to make statements or provide reports to regulatory bodies, government agencies or other government departments. Care should be taken to ensure that such statements or reports are correct, timely and not misleading. Senior management must be made aware of any sensitive disclosure before it is made. Care must also be taken when making statements to the media that information given is correct and not misleading. Enquiries from the media should be referred to company media relations experts and statements should only be made by designated spokespersons. The due diligence policy shall be revised yearly and record document should be kept safely available for a minimum of TEN (10) YEARS

Fundamental Principles and Rights

Somika supports the four fundamental principles in the ILO Declaration. Thus, in accordance with local legislation and practice we will respect freedom of association and the right to collective bargaining, employment will be freely chosen with no use of forced or child labour, and we will not discriminate on the basis of gender, color, ethnicity, culture, religion, sexual orientation or disability.

Harassment can be defined as unwanted behaviour, which a person finds intimidating, upsetting, embarrassing, humiliating or offensive. Conduct involving the harassment (racial, sexual or of any other kind) of any employee is unacceptable. Should an employee believe that he or she has been harassed the matter should be raised with the relevant Human Resources Manager who will arrange for it to be investigated without delay, impartially and confidentially.

We value all our employees for their contribution to our business and their opportunities for advancement will be equal and not influenced by considerations other than their performance, ability and aptitude. Employees will also be provided with the opportunity to develop their potential and, if appropriate, to develop their careers further with the company

Somika places the highest priority on promoting the health and safety of employees whilst at work. In particular, we will constantly review the effectiveness of our methods of operation to best protect stakeholders from mental and physical health and safety, environmental, and possible due diligence related risks.

Grievances, whistle blowing and improvement/development suggestion.

A grievance is a formal action brought forward by any individual, group of individuals or a community, who allege damage, impact or dissatisfaction as a result of the actions of the company or its contractors. The grievance entails the expectation of a response or a corrective action that may be compensation either in cash, services or in kind.

First Order Mechanism : refers to complaints/grievances that can be resolved directly between the site and the complainant through a process of direct and/or mediated dialogue either by the Grievance Officer (in collaboration with the relevant department) or by site management

Second Order Mechanisms : refers to the process that needs to be followed when the grievance cannot be resolved directly between the site and the complainant, requiring a review by a Grievance Committee. The appropriate third party governance structure for the Grievance Committee will be determined at each site and in collaboration with the community to ensure transparency and adequate independence.

Third Order Mechanisms : refers to the process that is followed to address grievances that utilize the formal Judicial System of the host country or other applicable judicial or non-judicial systems outside of the host country.

All grievances must be logged into the Somika grievance management system as they are received, along with the relevant target resolution dates. Tracking system will be used to record and report on all activities completed in connection with any grievance or complaint, its investigation and final resolution of the complaint including all aspects of the Resolution Agreement. The tracking System will serve as the electronic repository of all record information compiled in the process.

DUE DILIGENCE POLICY

SOMIKA Management guarantees to provide all necessary resources to ensure the successful undertaking of this policy, together with our commitment to the development and support of the people and local businesses.

January 2026

General Manager/CC