

# **STL Responsible Supply Chain Due Diligence Policy**



Société Congolaise pour le traitement  
du Terril de Lubumbashi

TUWE MFANO  
STL PROC-Rev 22-07-25 July 2025

*[Handwritten signature]*

## Table of Contents

1. Purpose .....	2
2. Scope .....	2
3. Policy Statement.....	2
4. Commitments .....	2
5. Roles and Responsibilities .....	3
6. Risk Assessment and Mitigation.....	3
7. Documentation and Record Keeping.....	3
8. Communication and Awareness.....	3
9. Grievance Mechanism.....	3
10. Review and Continuous Improvement.....	3
Annex I: List of relevant archived documents .....	4
1. Supply Chain Mapping and Traceability Records.....	4
2. Risk Assessment and Management Records.....	4
3. Policies, Procedures, and Governance Documents .....	4
4. Stakeholder Engagement and Communication Records.....	4
5. Monitoring, Reporting, and Improvement Records.....	5
6. Legal and Regulatory Compliance Records .....	5

---



# STL Responsible Supply Chain Due Diligence Policy

---

## 1. Purpose

The purpose of this policy is to establish STL's commitment to responsible sourcing and supply chain due diligence in accordance with international standards, including the OECD Due Diligence Guidance, the RMI Joint Due Diligence Standard (JDD), and the ISO framework for policy compliance. It defines STL's approach to managing environmental, social, governance (ESG), and human rights risks within its supply chain, even though STL sources exclusively from its own concession in the Democratic Republic of Congo.

## 2. Scope

This policy applies to all STL operations, employees, and stakeholders involved in the management, transformation, and export of mineral products derived from the legacy slag heap located within STL's facilities in Lubumbashi, DRC. It also applies to any service providers or partners involved in STL's supply chain and value chain processes.

## 3. Policy Statement

STL is committed to maintaining a responsible and transparent mineral supply chain. As an actor operating in a Conflict-Affected and High-Risk Area (CAHRA), STL recognizes the risks associated with sourcing, handling, and transforming mineral materials. While STL does not source externally, it maintains a robust due diligence system aligned with the OECD and RMI JDD frameworks.

## 4. Commitments

- Respect for human rights, including the prohibition of child labor, forced labor, torture, or other degrading treatment.
- Zero tolerance for corruption, bribery, and money laundering.
- No engagement with or support to non-state armed groups.
- Support for transparent payments and disclosure in line with the Extractive Industries Transparency Initiative (EITI).
- Engagement of public and private security providers is only under strict adherence to international human rights standards.
- Compliance with all applicable national laws, international norms, and industry expectations.



## **5. Roles and Responsibilities**

The RMI appointed person is accountable for the implementation of STL's Responsible Supply Chain Due Diligence Policy. This includes staff training, provision of resources, coordination of risk assessments, and engagement with external auditors. All STL personnel and business partners are expected to comply with this policy.

## **6. Risk Assessment and Mitigation**

STL conducts an annual risk assessment aligned with OECD Annex II risks and Fragile States Index (FSI) P3 Human Rights indicators. Risks include human rights abuse, illegal artisanal mining, corruption, tax irregularities, and environmental degradation. Mitigation measures include incident monitoring, grievance resolution, and third-party verification under the RMI RMAP framework.

## **7. Documentation and Record Keeping**

All documentation related to responsible sourcing, risk assessment, audits, and grievance mechanisms are retained for a minimum of five (5) years. Records are stored securely and made available for stakeholder review and external audits.

The relevant documents to be stored are in Annex I of this policy.

STL CAHRAs P3 Assessment Questionnaire will be filled out every year.

## **8. Communication and Awareness**

This policy is communicated to all STL employees, stakeholders, and partners. It is available publicly on STL's website. Annual updates on due diligence performance will be published in STL's annual due diligence report.

## **9. Grievance Mechanism**

Any individual or stakeholder may raise concerns about STL's supply chain practices through the company's grievance mechanism. All grievances are handled confidentially and reviewed in accordance with STL's Grievance Policy.

## **10. Review and Continuous Improvement**

This policy will be reviewed annually or in response to significant changes in legal requirements, operational context, or stakeholder feedback. STL is

committed to continual improvement of its Responsible Supply Chain Due Diligence System.

## **Annex I: List of relevant archived documents**

This document outlines the categories of physical and digital records that STL, as a mining company, should maintain. These archives support compliance with the five OECD-aligned due diligence steps and demonstrate responsible sourcing, risk management, stakeholder engagement, and legal compliance.

### **1. Supply Chain Mapping and Traceability Records**

- Mine production records (volume, type, and location)
- Transportation logs and weighbridge records
- Supplier and buyer contracts and declarations (KYC)
- Chain of custody documentation (shipment tracking, batch numbers)
- Export permits and customs documentation

### **2. Risk Assessment and Management Records**

- Risk assessment reports (e.g., ESG, human rights, security risks)
- Incident reports (accidents, security incidents, grievances)
- Risk register or matrix
- Internal audit reports
- Third-party assessments or baseline studies
- Risk mitigation plans and follow-up reports

### **3. Policies, Procedures, and Governance Documents**

- SHEC policy and supply chain policy
- Code of Conduct or Responsible Sourcing Policy
- Grievance mechanism procedures and logs
- Internal control procedures (due diligence SOPs)
- Training records

### **4. Stakeholder Engagement and Communication Records**

- Community consultation meeting minutes
- Correspondence with authorities, NGOs, and leaders
- Complaint and grievance logs
- Employee and contractor training attendance
- Records of industry initiatives or associations



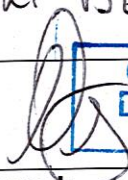



## 5. Monitoring, Reporting, and Improvement Records

- Internal and external monitoring reports
- Annual due diligence reports
- Corrective action plans and updates
- KPI monitoring data (HSE, environment, etc.)
- Reports submitted to regulators or RMI

## 6. Legal and Regulatory Compliance Records

- Environmental permits and monitoring data
- Health & safety inspection reports
- Labor and tax compliance records
- Security provider contracts
- Sanctions and embargo screening documentation

Name: GRANT DEMPSEY	Title: General Manager
Signature:  	Date: 1 AUG 2025
Version approved: REV 22-07-25	