



Conflict Minerals Policy Statement

Our Commitment

DKL Metals Limited fully shares the concerns of our customers and partners regarding the ethical sourcing of tin. We recognise the human and environmental risks associated with global mineral supply chains and have long maintained rigorous controls to ensure that conflict-affected materials never enter our production process. As specialists exclusively in tin-based materials, we take our responsibility for supply chain integrity seriously.

Our Partnership with Fenix Metals

The cornerstone of our ethical assurance is stemmed from our relationship with our parent company, Fenix Metals Sp. Z o.o. Almost all tin used in DKL manufacturing is sourced directly from their refinery, which operates under the highest levels of international scrutiny.

Fenix Metals provides us with a transparent and verifiably ethical supply route based on the following pillars:

- **100% Recycled Content:** Fenix Metals does not purchase or process any tin mineral concentrates. All raw material is sourced as secondary material, consisting entirely of recycled and scrap sources. Under international regulatory frameworks, including the US SEC "final rule" (Dodd-Frank Act), these secondary sources are by definition classified as 'DRC Conflict-Free.'
- **Industry Leadership:** As a long-standing member of the International Tin Association (ITA)—formerly ITRI—Fenix Metals holds a seat on the ITA Executive Board. They have been a key driver of the ITSCi initiative, ensuring that industry due diligence remains strictly aligned with OECD Guidance for high-risk areas.
- **Independent Verification:** Fenix Metals is an audited Conformant Smelter under the Responsible Minerals Assurance Process (RMAP). This status is maintained through annual third-party audits, providing independent proof that all material meets global responsible procurement standards.

Third-Party Procurement

On the rare occasion that tin alloys must be sourced from outside our parent company, our strict supplier evaluation procedure remains in effect. We require such suppliers to provide comprehensive evidence of due diligence, ensuring that any external material is purchased exclusively from certified conflict-free sources that mirror the high standards set by Fenix Metals.

Summary

By focusing on secondary, recycled materials and maintaining a direct link to an RMAP-conformant refiner, DKL Metals provides its customers with absolute certainty regarding their supply chain. We are proud to certify that all tin-based products supplied by DKL Metals are 'DRC Conflict-Free.'

Signed:

Date: 26/02/2026

