

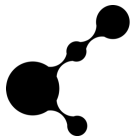
Power Resources International Ltd

Griffin House,
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Crawley,
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RH10 1DQ,
England
United Kingdom

RESPONSIBLE MINERALS ASSURANCE PROCESS DUE DILIGENCE PUBLIC REPORT

YEAR: 2024

DATE OF REPORT: 2025-04-19



1. COMPANY INFORMATION

COMPANY NAME:	POWERX Ltd.
CID NUMBER:	CID004054
COMPANY HQ ADDRESS:	KG608 St., No.: 4, Kacyiru, Kigali, Rwanda
REFINERY ADDRESS:	Bugesera Special Economic Zone, Bugesera, Rwanda
3TG MATERIAL PROCESSED:	Tantalum
COMPANY REGISTRATION NUMBER:	108118012
TYPE OF BUSINESS:	Tantalum Refinery
CURRENT REFINERY STATUS:	Active by RMI
PERIOD COVERED BY THIS REPORT:	Year 2024

PowerX Ltd. built its tantalum refinery in 2022, with the first production tests performed in Q4 of 2022.

PowerX Ltd. joined RMI in October 2022 and received its conformant status on 12th May 2023.

PowerX Ltd. Tantalum Refinery is located in Rwanda, and throughout 2024, was sourcing from Rwandan coltan mines exclusively. To follow OECD's and RMI's guidelines on sourcing conflict minerals responsibly, PowerX Ltd. is performing what is understood in the RMI guidelines as "enhanced due diligence". This enhanced Due Diligence (DD) is performed because PowerX Ltd is physically present in the Great Lakes Region of Eastern Africa and the mines supplying coltan to the refinery are located in a CAHRA region.

2. RMAP ASSESSMENT

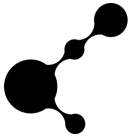
PowerX Ltd. has been a member of the Responsible Minerals Initiative (RMI) since October 2022, and by 12th of May 2023, held "Conformant" status on RMI's list of smelters, which it has held up to date.

PowerX Ltd underwent its second Responsible Minerals Assurance Process (RMAP) between the 3rd and 5th of June 2024. The period covered in this first assessment was 1st April 2023 to 30th April 2024. This second assessment is valid for one year. The evaluation was conducted by Arche Advisors. The assessment summary report is publicly available [here](#).

PowerX Ltd is committed to having these assessments done on an annual basis to validate conformance with RMAP protocols and current global standards on responsible sourcing of conflict minerals.

3. CORPORATE SUPPLY CHAIN POLICIES

PowerX Ltd. ensures full compliance with national and international laws and regulations. In support of this responsible sourcing PowerX Ltd. follows its parent company's Supply Chain Policy which is, among other policies available on the company's webpage (<https://pwr.ltd/sustainability>). For evaluation purposes, PowerX has an internal CAHRA procedure and Due Diligence process that conforms to the RMAP standard. Between these policies and processes and being physically present in the African Great Lakes region, which allows enhanced in-person Due Diligence assessments, PowerX can ensure it is only receiving minerals that are verified to be free of any OECD Annex II risk.



4. MANAGEMENT SYSTEM

GENERAL MANAGEMENT

All PowerX Ltd. employees whose roles include trade, processing, shipments of concentrates, or refining processes of conflict minerals are acquainted with the company's Supply Chain and Risk Management policies and their fundamental principle that it will only source minerals from verified mines with no OECD Annex II risks present and with full traceability of minerals' origin available.

Staff who are educated and competent in conducting due diligence and performing mine site assessments of mines' Employees are:

- Head of Sales and Traceability,
- Purchasing Manager,
- Traceability and Digitalisation Officer,
- Production manager

PowerX Ltd. performs desktop Due Diligence on its suppliers (Know Your Counterparty (KYC)) as well as an On-the-Ground Assessment Process (OGAP). All suppliers are less than 200km from the Refinery. During these OGAPs, PowerX checks the legal status of entities and daily mining logs to compare the mine's output with deliveries from that mine. PowerX also interviews key and random employees of the mine, checks health and safety measures, and inquires about any non-government armed groups operating in the area. The execution of OGAP is carried out by experienced and competent personnel (Traceability and Digitalisation officers, Field Officers). These officers report to Traceability and Digitalisation officers on a national level, and the Company Head of Sales and Traceability on an international level. The officers provide reports to the Head of Sales and Traceability, who oversees PowerX's ore purchasing operations, compliance, and the conformance of sourced materials. Meetings between teams carrying out the OGAP and their superiors are held weekly. Any actual or potential risks are reported up the chain of command within PowerX Ltd. to the Head of Sales and Traceability.

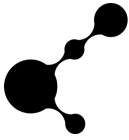
All existing and newly hired personnel are trained on Due Diligence procedures and all other job-relevant Company policies with an emphasis on implementing Supply Chain Policy and due diligence procedures.

In 2024, PowerX exclusively utilised its own government-licensed Due Diligence and Traceability system in Rwanda. This system meets the OECD requirement for third-party oversight, as it operates under a license issued by the Rwanda Mines Board (RMB), with RMB agents assigned to witness and verify production records and chain of custody events.

INTERNAL SYSTEM OF CONTROL

PowerX Ltd. reviews its Due Diligence and OGAP systems at least once per year, monitoring their adequacy and effectiveness in the region and markets to which PowerX Ltd. is sourcing or selling products to. If required, proactive measures are taken within the one-year period between planned reviews. Should an unanticipated development occur, a reactive measurement will follow in the shortest achievable time.

PowerX Ltd. operates its own laboratory to determine the quality of materials that are offered to, or purchased by PowerX Ltd. Standard Operating Procedures (SOP's), cover all aspects of the material control system, from compliance control, mass balance control, acceptance, and reporting.



SUPPLIER ENGAGEMENT

PowerX Ltd. is actively facilitating government agencies in charge of the mining sector development in Rwanda to further engage with suppliers on mine development, environmental sustainability and other impact initiatives which contribute to transparency and relationship building in the supply chain.

Working with the Suppliers allows PowerX Ltd. to make regular mine-site visits and provide due diligence reports based on those visits. Findings from these mine site visit reports are shared with buyers downstream, or relevant industry-recognised bodies, as necessary.

Reports on work and engagement with local communities are not publicly shared for community protection reasons but are regularly shared with the Company's Independent Chairman and key company stakeholders such as lenders or advisory personnel as well as being made available to any mandated auditor.

GRIEVANCE MECHANISM

PowerX Ltd. follows its Parent company's Human Rights Policy which defines that both employees and stakeholders within local communities have access to appropriate grievance mechanisms. The policy is publicly available on the company's website.

RECORD KEEPING

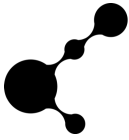
All of the company's records are retained digitally and in hard copy for a minimum period of 5 years. Internal material control continuously monitors inventory via receipts, physical inspection and inventory logs. Within these systems, any mass balance discrepancies are investigated.

5. RISK IDENTIFICATION AND MITIGATION

PowerX follows an in-house supplier evaluation process which is in line with the Company Supply Chain Policy, the OECD Guidance for Responsible Supply Chain of Minerals from Conflict Free and those from High Risk Areas, with one goal to stop and prevent trade in minerals where funds from those minerals support conflict and/or gross human rights abuses.

PowerX Ltd. is fully committed to conformance with the position of the Organisation for Economic Co-operation and Development (OECD) concerning responsible supply chain management and supporting their customers' compliance with the Dodd-Frank Act, and the EU Conflict Minerals Regulation and avoids the use of ores and metals that finance or benefit armed groups or are linked to gross human rights abuses. PowerX Ltd. is committed to refraining from any act which contributes to the financing of conflict and complies with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

All potential suppliers are first introduced to the Supply Chain Policy. They undergo the Supplier Evaluation process which consists of 'Risk assessment and CAHRA country/region identification of material source', to identify any potential OECD Red Flags and categorise them. Based on this characterisation PowerX performs risk response planning of the supplier and then determine if it rejects or accepts the supplier. Every new supplier goes through this process, and once verified as acceptable on a desktop Due Diligence level, is visited in person by PowerX Ltd.'s competent personnel who perform Mine Site Due Diligence, verifying a number of issues including the plausibility of mine's output, making sure there is no child or forced labour present, that employees are paid according to local labour laws, and that no armed groups benefit in any way from Mine's activities.



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PowerX Ltd. assesses gathered data, defines the potential risks, and makes a decision whether the communication and due diligence process with a potential supplier should continue or whether the communication should cease. In case of the latter decision, PowerX Ltd. terminates communication with the potential supplier who has not passed the screening for a minimum of 6 months.

In 2024 PowerX Ltd. sourced concentrate from mines located in Rwanda, which is defined as a CAHRA. In all deliveries, PowerX followed the prescribed procedures and made Due Diligence visits to mining sites to verify the legal status, the origin of materials delivered, the chain of custody mechanisms used, working conditions etc. The mines passed the Due Diligence process and are considered acceptable suppliers for the period of 12 months since the day the Due Diligence visit was done. Due Diligence Reports' findings are made available to PowerX Ltd.'s clients downstream.

Sincerely,
PowerX Ltd.

Prepared by:

Primož Meze
Head of Sales and Traceability

Signed by:

Ray Power
CEO
PowerX Ltd