

PRG DOOEL
Franc Mesesnel 2
1000 Skopje
Macedonia

Conflict Free Policy

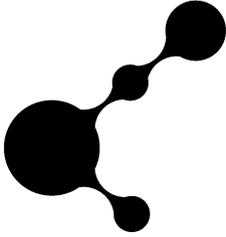
August 15th, 2017

Trade in conflict minerals is a persistent problem in certain African states where mineral wealth has been proven to perpetuate conflict and fuel human rights atrocities.

Blood diamonds are the most notorious example of conflict minerals and gold is well known too. However, less attention surrounded the likes of tin, tantalum, and tungsten, until recent years when the United States, in 2010, introduced the Dodd-Frank Wall Street Reform and Consumer Protection Act which requires manufacturers to audit their supply chains and report conflict minerals usage.

As a primary and secondary processor of tantalum, PRG takes its role in the supply chain very seriously. Not only is PRG striving to set new standards of human rights in the mining industry, but it recognises that conflict minerals are of such a serious and shocking nature that they demand a moral and highly ethical response. Therefore, PRG fully supports the position of the Organization for Economic Co-operation and Development (OECD) and the Dodd-Frank Act to avoid use of ores and metals that finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

- In the first instance, it is PRG's fundamental principle that it will only source minerals from conflict free certified mines with full traceability.
- PRG will comply with industry best practices and the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains.
- PRG will work with established agencies and membership organizations such as the CFSI to ensure its best practices are audited by independent third parties and provide impartial oversight.
- PRG will further develop methodologies and systems to improve traceability and accountability in the supply chain.
- PRG applies Risk management procedure in aim to minimize the different types of risks within its operations and whole logistics supply chain.



PRG DOOEL
Franc Mesesnel 2
1000 Skopje
Macedonia

- PRG will tolerate zero tolerance of Human Rights violations, through implementation of Human Rights policy.
- PRG will ensure high level Business ethics standards through Business ethics, Escalation and Anticorruption policy.
- PRG ensure full compliance with the national and international laws and regulations.
- As some conflict minerals may also contain radioactive materials, such as thorium and uranium, PRG will require that all shipments falling into the Class 7 category adhere to the appropriate national and international regulatory frameworks.
- Work with governments, communities, and NGO's, in countries and areas affected by conflict minerals, to develop initiatives and strategies to that with more transparency and accountability in the supply chain whilst lessening the financial and bureaucratic constraints imposed on miners and artisanal workers in the industry.

In the longterm, it is PRG's aim to contribute in a relevant and valuable manner which will have a lasting impact in permanently eliminating the possibility for minerals to fund conflicts.

All employees and stakeholders are encouraged to contact the Compliance Manager Nadica Stavrova, on ns@prgplc.eu , Tel: +389 2 322 0093, should they have any comments or queries about this Policy requirements.

Chief Executive Officer
Raymond Power
