



# SUPPLY CHAIN DUE DILIGENCE POLICY

*Concord Strategic Group LLC*

Reference: CSG\_POL\_001 | Version 2.0 | April 2026

## **PUBLIC | DECLARED COMPANY POLICY**

*Issued by Concord Strategic Group LLC. This policy applies to all suppliers, all jurisdictions, and all personnel involved in commercial engagement, and the actions CSG takes when its standards are at risk.*

## **1 Policy Statement**

**1.1** Concord Strategic Group LLC (CSG) operates as an upstream commodity trade facilitator connecting licensed mineral producers with institutional buyers. The integrity of every transaction CSG facilitates depends on the integrity of the supply chain behind it.

**1.2** CSG conducts supply chain due diligence in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition (the OECD Guidance), and the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) Standards. CSG is an active RMI Upstream Facility (CID005689) with Due Diligence Approved status.

**1.3** CSG does not purchase, facilitate, or coordinate the sale of mineral material without first verifying the identity, licensing, regulatory compliance, and operational capacity of the supplying entity. No commercial agreement is executed without completion of the supplier due diligence process described in this policy.

## **2 Scope**

**2.1** All suppliers of tin concentrate and other mineral commodities sourced through CSG's supply mandates.

**2.2** All jurisdictions in which CSG's supply chain partners operate, with heightened attention to Conflict-Affected and High-Risk Areas (CAHRAs) as defined under the OECD Guidance.

**2.3** All CSG personnel, agents, advisors, and representatives involved in supplier engagement, transaction structuring, or commercial documentation.

**2.4** All additional minerals added to CSG's commodity scope in the future, on the same terms as tin concentrate unless a separate written policy is issued.

## **3 Risks Addressed Under OECD Annex II**

CSG will not tolerate, profit from, contribute to, or facilitate any of the following in connection with mineral material moving through its supply chain. These risks are drawn from Annex II of the OECD Guidance.

**3.1** Serious human rights abuses: any form of torture, cruel, inhuman, or degrading treatment; any form of forced or compulsory labour, including bonded labour; the worst forms of child labour; other gross human rights violations and abuses, including widespread sexual or gender-based violence; war crimes, crimes against humanity, or genocide.

**3.2** Direct or indirect support to non-state armed groups, including procurement of minerals from, payments to, or the provision of logistical assistance, equipment, or financial support to such groups or their affiliates.

**3.3** Public or private security forces engaged in serious abuses or in the illegal control of mining sites or transit routes. CSG expects suppliers to engage security forces consistent with the Voluntary Principles on Security and Human Rights.

**3.4** Bribery and fraudulent misrepresentation of the origin of minerals. CSG will not engage with suppliers who misrepresent the origin of minerals, falsify documentation, or seek to evade due diligence requirements through structural concealment.

**3.5** Money laundering. All payment flows are routed through verified bank accounts, with source-of-funds documentation retained for the period required by applicable law.

**3.6** Non-payment of taxes, fees, and royalties lawfully due to host or transit governments in connection with the extraction, trade, or export of mineral material.

## 4 Disqualifying Conditions

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Identification of any of the following will result in immediate suspension of engagement with the relevant counterparty pending full review by the Managing Director and Compliance Officer. Confirmed findings result in termination of the relationship and a documented record retained for a minimum of seven years.

**4.1** Designation of the supplier, beneficial owner, vessel, or counterparty on any applicable sanctions list (OFAC SDN, EU, UN, OFSI, or comparable).

**4.2** Confirmed use of forced labour, bonded labour, or the worst forms of child labour at any point in the supply chain.

**4.3** Sourcing without a valid mining licence or export authorisation in the producing jurisdiction.

**4.4** Refusal or repeated failure to provide assay, origin, or chain-of-custody documentation following formal request.

**4.5** Credible evidence of payments to non-state armed groups, or of mineral material having transited through territory under their control.

**4.6** Misrepresentation of the origin, grade, or volume of mineral material at any stage of negotiation or shipment.

## 5 OECD Five-Step Framework Implementation

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The OECD Guidance prescribes a five-step risk-based framework for supply chain due diligence. The table below shows how CSG implements each step.

Step	Title	CSG implementation	Reference
1	Establish strong company management systems	Adopt and publish this policy. Maintain a documented Quality Management System. Assign senior accountability to the Managing Director and operational implementation to the Compliance Officer.	CSG_POL_001, CSG_QMS_001
2	Identify and assess risks in the supply chain	Apply the CSG Supplier Due Diligence Questionnaire to every supplier. Assess CAHRA status of each sourcing origin. Map chain of custody. Identify Annex II red flags.	CSG_GEL_DDQ_001, CSG_OPS_007
3	Design and implement a risk response strategy	Report identified risks to the Managing Director. Apply the response framework: continue with mitigation, suspend pending mitigation, or disengage. Track mitigation performance.	CSG_OPS_002
4	Carry out independent third-party audit	Maintain RMI RMAP membership and participate in scheduled assessments. Submit to additional independent audit on reasonable buyer request. Maintain audit records for seven years.	RMI CID005689
5	Report on supply chain due diligence	Publish an annual public Due Diligence Report on concordstrategicgroup.com summarising due diligence performed during the year. Communicate findings to buyers on request.	CSG_CMP_003

## 6 Supplier Due Diligence Process

Before any supplier enters CSG's active supply chain, the supplier completes the CSG Supplier Due Diligence Questionnaire (CSG\_GEL\_DDQ\_001). The questionnaire covers five areas of verification.

**6.1** Corporate verification: legal identity, registration, beneficial ownership down to natural persons, financial standing, group structure.

**6.2** Mining and regulatory compliance: valid mining licence, export permit, conflict-free declaration, environmental compliance, RMI status.

**6.3** Production and quality verification: independent assay reports from accredited laboratories, bills of lading, commercial invoices, production capacity confirmation.

**6.4** Logistics and terminal verification: freight forwarder relationships, export terminal licensing, chain-of-custody documentation, transit jurisdictions.

**6.5** Financial information: bank account verification, source of funds confirmation under AML and KYC requirements, ultimate beneficial ownership of payment accounts.

**6.6** CSG personnel will conduct site visits to selected supplier operations on a sampling basis. Visit findings are documented in writing and retained in the supplier file.

**6.7** All counterparties, beneficial owners, vessels, and financial intermediaries are screened against the OFAC Specially Designated Nationals list, the EU Consolidated Financial Sanctions List, the UN Consolidated Sanctions List, and the UK OFSI Consolidated List at onboarding and on an ongoing basis.

**6.8** No assay data, buyer identity, or supply specification is shared with any counterparty before the supplier due diligence process is complete and the applicable Non-Circumvention, Non-Disclosure and Commission Agreement (NCNDA) is executed.

## 7 Conflict-Affected and High-Risk Areas (CAHRAs)

**7.1** For each sourcing origin, CSG assesses CAHRA status using OECD CAHRA designations, UN Security Council resolutions, U.S. Department of State and U.K. FCDO country guidance, and recognised third-party governance indices.

**7.2** Sourcing from a confirmed CAHRA is not automatically disqualifying. It triggers enhanced due diligence under CSG\_OPS\_007, requires written approval from the Managing Director before commercial engagement, and requires documented risk mitigation measures for the duration of the engagement.

**7.3** The decision rationale is recorded and retained for a minimum of seven years.

## 8 Senior Accountability

Role	Responsibility under this policy
Managing Director	Ultimate accountability for supply chain due diligence. Approval authority for all CAHRA engagements. Annual review and amendment of this policy.
Compliance Officer	Day-to-day implementation of this policy. Maintenance of the supplier due diligence record. Coordination of RMI RMAP assessments. Preparation of the annual public Due Diligence Report. First point of contact for grievance reports.
Operations Lead	Execution of supplier engagement, site visits, and chain-of-custody verification at the operational level. Reporting of red flags to the Compliance Officer.
All Personnel	Adherence to this policy. Reporting of any actual or suspected violation through internal channels (CSG_GOV_001, CSG_GOV_003) or the public grievance channel.

## 9 Anti-Bribery in Mineral Sourcing

**9.1** CSG personnel will not offer, give, request, or accept any unlawful gift, payment, or consideration of any kind as an inducement or reward for securing tin concentrate or any other mineral material. This prohibition applies to direct counterparties, intermediaries, government officials, and any person acting on behalf of any of the foregoing.

**9.2** All government taxes, fees, and royalties are paid only through official channels and against documented invoices issued by the relevant authority.

**9.3** This commitment operates alongside, and does not displace, the broader anti-bribery and anti-corruption requirements in CSG\_GOV\_001 and applicable U.S. Foreign Corrupt Practices Act and U.K. Bribery Act obligations.

## 10 Grievance Mechanism

**10.1** CSG operates a grievance channel accessible to any person, community, or institution with a concern relating to CSG's supply chain. Grievances may be submitted in writing to [compliance@concordstrategicgroup.com](mailto:compliance@concordstrategicgroup.com). Receipt is acknowledged within five business days. Substantive response is provided within thirty business days.

**10.2** The full procedure, including escalation pathways and confidentiality protections, is set out in CSG\_GOV\_005 (Grievance Mechanism Procedure). Internal personnel reporting is governed by CSG\_GOV\_003 (Whistleblower Policy).

## 11 Industry Initiatives and External Frameworks

Initiative	CSG status
Responsible Minerals Initiative (RMI)	Active Upstream Facility, CID005689. Program Status: In Due Diligence. Sub Status: Due Diligence Approved.
OECD Due Diligence Guidance, 3rd Edition	Full alignment. Five-step framework integrated into Section 5 of this policy and underlying procedures.
International Tin Association (ITA) Tin Code	Registration in progress. CSG intends to file annual Tin Code reports following first transaction.
ITRI Tin Supply Chain Initiative (ITSCi)	ITSCi does not currently operate in CSG's primary sourcing jurisdiction. CSG applies equivalent traceability through producer-level documentation, accredited assay, and independent inspection.
Voluntary Principles on Security and Human Rights	Aligned. Suppliers expected to engage public and private security forces consistent with the Voluntary Principles.

## 12 Regulatory Alignment

Regulatory framework	CSG approach
U.S. Dodd-Frank Section 1502	Conflict-free declaration required from all suppliers. Chain-of-custody documentation maintained to support buyer disclosure obligations on the Conflict Minerals Reporting Template (CMRT).
EU Conflict Minerals Regulation (2017/821)	Supply chain documentation structured to support EU importer due diligence obligations. RMAP recognition by the European Commission relied on.
U.S. Foreign Corrupt Practices Act and U.K. Bribery Act	No payments, gifts, or inducements outside of official invoiced taxes, fees, and royalties. Books and records maintained as required.
OFAC and equivalent sanctions regimes	Counterparty screening at onboarding and on an ongoing basis against OFAC SDN, EU, UN, and UK OFSI consolidated lists.

Regulatory framework	CSG approach
Uyghur Forced Labor Prevention Act and equivalent forced labour statutes	Forced labour screening as part of supplier due diligence. Region-of-origin documentation required for all material.
Financial Action Task Force (FATF) recommendations	Source-of-funds verification, beneficial ownership identification, and payment routing through verified institutional accounts.

### 13 Public Reporting and Records

**13.1** CSG publishes an annual public Due Diligence Report on [concordstrategicgroup.com](http://concordstrategicgroup.com). The report summarises due diligence performed during the year, suppliers active in the year, risks identified and the response taken, and any material change to CSG's supplier base. The first report covers calendar year 2026.

**13.2** Buyer-specific disclosures are provided on reasonable request, subject to confidentiality obligations to other counterparties. All supply chain due diligence records are retained for a minimum of seven years from the date of the relevant transaction or activity.

### 14 Document Control

**14.1** This policy is reviewed annually by the Compliance Officer and approved by the Managing Director. Material changes to CSG's supply chain framework, regulatory environment, or RMI membership status trigger an out-of-cycle review.

**14.2** Amendments require written approval from the Managing Director. All versions are retained in CSG's compliance records under CSG\_QMS\_002.

*Approved by the Managing Director of Concord Strategic Group LLC and adopted as the active governing policy of the company on the effective date stated above. This document supersedes CSG\_POL\_001 v1.0 in its entirety.*