AURA METALS LTD

KINGS HOUSE, 174 HAMMERSMITH ROAD W6 7JP LONDON, UK

Reg. No 4147608

V.A.T. No. 769 085876

shipping@aura.co.uk

EORI No. GB769085876000

Aura Metals Limited

Conflict Mineral Policy

This policy is related to the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act Section1502 (e)(4) and covers:

Columbite-tantalite (coltan), Cassiterite, Gold, Wolframite or their derivatives, as well as any other mineral, or their derivatives, coming from the Democratic Republic of the Congo or an adjoining country.

Aura Metals policy is to exclude conflict minerals from their supply chain. The total amount of potential conflict minerals coming from primary sources in which the company trades is minimal.

These primary sources are restricted to:

1. Primary Tin
2. Tin-based alloys
3. Copper-based tin-containing alloys.

None of the other minerals covered under Dodd-Frank above or any materials coming from the Democratic Republic of the Congo, or an adjoining country, will be traded by the group without the express agreement of the Managing Director after all due diligence and traceability checks have been carried out.

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With respect to the three items above we follow specific policies:

1. We will only buy primary Tin from producers said to be conformant to the Responsible Minerals Initiative website.
2. We will only buy tin-based alloys after confirming with our suppliers that any primary tin contained in the alloy has been checked as coming from producers said to be conformant to the Responsible Minerals Initiative website.
3. Whilst the tin in copper-based alloys is nearly all from scrap sources all our suppliers are asked to confirm that any primary tin used as an addition has been checked as coming from producers said to be conformant to the Responsible Minerals Initiative website.

All contracts made by Aura Metals have clauses stating that:

A. Any material being supplied is conflict free as defined by the Dodd-Frank Act.
B. No material being supplied against the contract has come from the Democratic Republic of the Congo without the express agreement of Aura Metals after all due diligence and traceability issues have been undertaken to ensure that the material being supplied is conflict free as defined by the Dodd-Frank Act.

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Roger Cohen

MD



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