

Conflict Minerals Policy Statement

Background

We support ending the violence and human rights violation in the mining of certain minerals from a location described as the "Conflict Region" which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries.

The US Securities and Exchange Commission adopted final rules to implement reporting and disclosure requirements to "conflict minerals" as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with SEC to disclose whether the products they manufacture contain "conflict Minerals" that are necessary to the function or production of those products. The conflict mineral requirements are continuing regulatory obligations, NeoNickel Ltd inquire regularly of all of its mill suppliers that they continue to comply with the conflict minerals requirements.

The definition of "Conflict Minerals" refers to gold, tin, tantalum and tungsten, the derivatives of cassiterite, columbite-tantalite and wolframite, regardless of where they are sold. The US Secretary of State may designate other minerals in the future.

We support these requirements to further the humanitarian goal of ending violent conflict in the Democratic Republic of the Congo (DRC) and in surrounding countries, which has been partially financed by the exploitation and trade of "conflict minerals".

Our Commitment

- a) To support the aims and objectives of the U.S. legislation on the supply of "conflict minerals"
- b) To not knowingly procure specified metals that originate from facilities in the "conflict region" that are not certified as conflict free
- c) Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified materials are being sourced from:
 - Mines and smelters outside the "Conflict Region"
 - Mines and Smelters which have been certified as "conflict free" if sourced within the "Conflict Region"

Due diligence includes requesting from our suppliers written confirmation that any materials supplied to NeoNickel originate from outside the "Conflict Region" or if they originate from within the "Conflict region" that the mines and smelters be certified as "conflict free" by an independent third party. The aim is to ensure that only "conflict free" materials are used to produce products that we sell.

Chris Halstead
President of NeoNickel



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