

STAR DRAGON CORPORATION LIMITED

Supply Chain Policy for Sourcing of Mineral Ores

Star Dragon Corporation Limited (Star Dragon) is a Hong Kong registered company that trades in metallic ores from Africa. Our purchases occur only through agreements with government registered mining companies and or co-operatives who operate legally within the sector policy framework. We are completely dedicated to the ideals and policies of the OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris. <http://dx.doi.org/10.1787/9789264252479-en> (OECD), and committed to implementing processes and controls in line with the best available standards. and understand all of the requirements of the OECD. We endeavor to implement all OECD guidelines in our working policies.

Despite our small size we continuously strive become the most responsible metal ore trading company. Star Dragon has adopted and is incorporating as much of the relevant portions, of the iTSCi membership standards in our purchasing agreements as we can.

Implementation of OECD guidelines will be the standard and method of guaranteeing that SD purchases contain no materials from unknown or other sources that could possibly have benefited illegal armed groups either through extraction or transport.

Controls and transparency over the mineral supply.

1. Star Dragon traceability system will follow requirements of the OECD.
2. Star Dragon and its clients are responsible for understanding any updates to the OECD guidelines and implementing the latest version and as such modifications to the OECD guidelines are included in our policies
3. Star Dragon will only purchase and sell legally produced minerals, that have been tagged under the iTSCi traceability system from cooperatives and mines with high ethical standards operating in Conflict areas.
4. While the OECD guidelines and standard are our adopted policy, we will continue to support the implementation of the principles set forth under the following regulations and initiatives as well:
 - iTSCi Supply Chain Initiative
 - UN Security Council Resolutions
 - Extractive Industry Transparency Initiative (EITI)
5. Star Dragon Corporation Ltd will require the following information from its suppliers in line with the OECD
 - Location or origin of minerals
 - Transit route of any minerals
 - Documentation ie evidence of :
 - Tax payments
 - Local or municipal fee or levy
 - Royalties or other payments made to government agencies.
 - Export of minerals permit where applicable;
 - Receipt of any payments made to public or private security companies.