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Re: Conflict Mineral Policy

Vista Metals' Conflict Minerals Policy reflects our commitment to comply with the industrial, legal and customer requirements to ensure Vista Metals Inc (VMI) does not directly or indirectly engage with suppliers where VMI identifies a reasonable risk that they are sourcing from, or linked to, any party committing human rights or related abuses. Our policy applies to all VMI entities and all suppliers who provide materials that contain tin, tantalum, tungsten and/or gold that are warehoused, distributed or further processed.

The following are the documents governing VMI's policy:

- Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502
- OECE Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas
- Conflict-Free Sourcing Initiative (CFSI), Conflict-Free Smelter Program (CFSP) & Conflict-Free Minerals Reporting Template (CMRT)

➤ Conflict Minerals are defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, including tin, tantalum, tungsten and gold.

➤ Conflict affected mines and high-risk areas are mines or areas identified by the presence of armed conflict, widespread violence, or other risks of harm to people, including the eastern region of the Democratic Republic of the Congo (DRC).

POLICY

Vista Metals recognizes how the trading, handling, extracting and exporting such minerals as stated above from conflict-affected and high-risk areas may lead to human rights or related abuses. As a responsible company VMI has the duty to respect human rights, not contribute to these conflicts, commits to refraining from any action which contributes to the financing of such conflict.

VMI's suppliers who provide materials that contain tin, tantalum, tungsten or gold that are used in VMI's product shall :

- ❖ Create a conflict minerals policy.
- ❖ Implement a due diligence program in accordance with eh OECD due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas.
- ❖ Provide a completed CFSI CMRT at least annually.
- ❖ Be proactive in providing updates to VMI when changes occur to the CFSI CMRT form.