Raw Material Policy for H.C. Stark Inc.

This Policy is valid for the H.C. Stark Inc. Group and its affiliates.

H.C. Starck Inc. (H.C. Starck) is one of the leading global fabricators of Tantalum, Tungsten, Niobium and Molybdenum. We are committed to ensuring safety, health and protection of the environment and the people who come in contact with our products. As responsible corporate citizens we pursue excellence in fulfilling governmental, industrial and environmental standards worldwide.

It is the Policy of H.C. Starck to implement a due diligence management system that aligns with Organization of Economic Co-Operation and Development due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas third edition (OECD Guidance). Our commitment to avoid purchasing tantalum-containing material that may pose a risk of contributing the harm listed in Annex II of the OECD guidance includes the following:

- **Serious abuses associated with the extraction, transport or trade of minerals:**
  - Any forms of torture, cruel, inhuman and degrading treatment
  - Any forms of forced for compulsory labor
  - The worst forms of child labor
  - Other gross human rights violations and abuses such as widespread sexual violence
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

- **Direct or indirect support to non-state armed groups**
- **Direct or indirect support to public or private security forces**
- **Bribery and fraudulent misrepresentation of the origin of minerals**
- **Money laundering**
- **Non-payment of taxes, fees and royalties to governments**

Should we identify any of the risks described above in our supply chain we will immediately suspend or discontinue activities with those partners.

We undergo a yearly third-party audit according to the protocol established by the Responsible Minerals Initiative (RMI) as a way of maintaining our Conformant Smelter status.

We are committed to actively support our customers with their diligence and disclosure requirements defined in section 1502 of the Dodd-Frank Wall Street reform and Consumer Protection act pertaining to conflict minerals and the regulations promulgated thereunder by the U.S. Securities and Exchange Commission.
We commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders and the public (as required).

Following ethical, social and environmental principles along with strong recycling and certified procurement policies, we provide a conflict-free and sustainable material supply for our customers.

The commitment to this policy by our raw material suppliers is a mandatory component of the initial and continuing supplier qualification of our suppliers.

Should any party wish to voice a concern regarding the circumstances of mineral extraction, trade, handling or export they can report it via the RMI Grievance mechanism procedure and reporting function at:

http://www.responsiblemineralsinitiative.org/minerals-due-diligence-container/riskmanagement/grievance-mechanism/

Andreas Mader
President & Chief Executive Officer
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