

## **H.C. Starck Inc. Raw Material Policy**

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 encounter 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 the 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). We are committed to avoiding the purchase of tantalum-containing material that may pose a risk of contributing to the harms listed in Annex II of the OECD guidance which includes the following:

Regarding serious abuses associated with the extraction, transport, or trade of minerals:

- While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:
  - Any forms of torture, cruel, inhuman, and degrading treatment.
  - Any form of forced or compulsory labor.
  - The worst form 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 or any form of 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 RMAP 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.

H.C. Starck supports the principles and criteria outlined by the Extractive Industry Transparency Initiative (EITI)

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

H.C. Starck is committed to meaningful stakeholder engagement, including accepting and acting on complaints or recommendations on how to improve our due diligence program.

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/rmap/grievance-mechanism/>



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May 21, 2021