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H.C. Starck Inc. 2020 Public Due Diligence report.

1. Company Information

Our company name is H.C. Starck Inc.

The company has one smelting facility, located at 45 Industrial Place newton, MA. with CID number 002548. The smelting/refining facility is processing tantalum products.

2. RMAP Assessment Summary

Our Newton Ma Facility underwent a RMAP assessment on November 19-20, 2019. The assessment is valid for one year. The assessment period was from October 1, 2018 to November 20, 2019. The assessment was conducted by SCS Global services an RMI appointed Sourcing Audit Firm.

The assessment summary report is public and available on the RMI Homepage under our CID number in the conformant tantalum smelters list. <http://www.responsiblemineralsinitiative.org/tantalum-smelters-list/>

3. Company Supply Chain Policy

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, the company has developed a supply chain policy. It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is committed to addressing any OECD Annex II risks if identified. The policy was reviewed and approved by senior management, who has committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, key employees etc.) and is available on the company website at www.hcstarcksolutions.com

4. Company Management Systems

Management Structure

The company follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:

- The company's CFO is responsible to oversee the due diligence program and risk management design and implementation. As mentioned in our KYC Procedure senior management will be informed if any supply chain risks are identified or if any are reported through the RMI's grievance mechanism.*
- The company has assigned a due diligence program manager to coordinate the work of relevant departments to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report any red flags and potential risks identified and seek out opportunities to improve the program.*

- *Other Key members of the Starck due diligence team includes:*
 - *Our Raw Material buyer, who is responsible for the day to day raw material procurement. The buyer is also the Starck Liaison with Ta suppliers.*
 - *Our Global Procurement manager who oversees all global procurement activities.*
 - *Our Global Supply Chain Director who is responsible for all global supply chain activities.*

- *The company conducts due diligence management system training once a year for all employees and a more detailed training for those Key members of the Starck due diligence team.*

Internal Systems of Control

The company has established/updated its due diligence management system to be aligned with the OECD Guidance and RMAP.

The company has implemented a know your supplier process (KYC) in which the company evaluates and approve its suppliers. This evaluation will be conducted annually with all existing suppliers. Any potential suppliers will be required to complete the KYC process before they can become an approved supplier. This evaluation includes completing survey materials, to identify the type of business relationship and the legality of the business operations, including business license and structure. It also requires an understanding and agreement to our supply chain policy and ensuring the supplier is a certified supplier that is identified on the RMI website as such. The Company will ONLY source from RMI conformant certified tantalum suppliers.

The company has a documented procedure which describes the process to Identify possible risks outlined in the OECD Annex II risks, that could be associated with Conflict affected, and High-Risk areas (CAHRAS) in our supply chain, related to our Tantalum sourcing. This procedure includes knowing and understanding the materials origins and transportation routes.

The company communicates the updated supply chain policy and sourcing requirements to all identified upstream suppliers via our supplies code of conduct as well as through our Terms and Conditions stated on our purchase orders. In this way the company has incorporated due diligence requirements into legally binding agreements with direct 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 @ <http://www.responsiblemineralsinitiative.org/minerals-due-diligence-container/risk-management/grievance-mechanism/> Employees may also report a concern or grievance Via H.C. Starck's anonymous phone messaging system.

The company will conduct an annual review of the effectiveness of the due diligence management system. Should any part of the system be deemed ineffective corrective actions will be taken immediately by the program manager and reported to the CFO to ensure the system remains effective.

Record Keeping System

All material receipts are entered into our ERP system. As part of our annual conformant suppliers audit these transactions are audited by a third party and an inventory balance analysis is completed to ensure all inventory is accounted for.

The company requires that all records relating to the due diligence program are maintained at least for five years and that they be properly used and safely stored.

5. Risk Mitigation

*Our company policy only permits the purchase of raw materials from **Conformant Tantalum Smelters** that have been certified conformant and are listed on the RMI Conformant Smelters list. If / when risks are identified Starck will work to mitigate these risks with the supplier.*

Should a supplier cease to be listed on the conformant Smelters list, continue to have any unmitigated Red Flags or risks or fall outside our established risk guidelines we would not engage in any additional purchases until the matter is resolved.