

Exotech's Responsible Sourcing Policy

Exotech's Position on Conflict Minerals

Exotech is aware of and actively supports the multilateral efforts to investigate, monitor and stop activities that contribute to illegal armed groups, human rights violations, or financial wrongdoings in tantalum supply chains as defined in Annex II of 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).

Exotech respects the dignity of all people and importance of human rights and considers any mineral that may pose risks of contributing to the harm listed in Annex II of the OECD Guidelines to be 'conflict minerals'. Exotech specializes in refining scrap material and will only purchase these materials from sources that we believe to be conflict-free.

In support of the above, Exotech's President directs and trains all relevant staff on procedures to implement a conflict minerals due diligence system that aims to:

- Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance and the Responsible Business Alliance's Responsible Minerals Assurance Process (RMAP) and expect our suppliers to do the same.
- Provide and expect our suppliers to cooperate in providing due diligence information to confirm that conflict minerals in our supply-chain do not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of the OECD Guidance.
- Identify suppliers who may pose a reasonable risk of sourcing or supplying conflict minerals according to the following list of risks as defined in the OECD Guidance Annex II Model Supply Chain Policy:
 - Serious abuses associated with the extraction, transport, or trade of minerals
 - Any forms of torture, cruel, inhumane, and degrading treatment
 - Any forms of forced or 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

If risks are identified in the supply chain, the following steps will be taken to address the issue in accordance with the severity of the risk:

- Report findings to senior management, outlining the information gathered including the actual and potential risks identified in the supply chain risk assessment.

- Work directly with suppliers to determine if actions have been taken or can be taken to mitigate risks. If mitigation can be conducted, Exotech will work with the supplier to develop an appropriate risk mitigation plan.
 - Dependent upon the severity of the risk, possible mitigation strategies include:
 - Continuing trade throughout the course of measurable risk management efforts.
 - Temporarily suspending trade while pursuing ongoing mitigation efforts.
 - Disengaging with a supplier in cases where mitigation appears not feasible or unacceptable.
 - Compliance Officer will monitor progress over time and document such efforts.
- Undergo an annual RMAP assessment for tantalum-containing materials as well as identify opportunities to continually improve our conflict minerals due diligence management system.
 - 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).

Any concerns about our policy or due diligence system should be reported to the Responsible Minerals Initiative through its grievance mechanism that can be accessed by clicking on the following link:
[RMI Grievance Mechanism](#)

This is a statement of Exotech's long standing policy on conflict minerals that was established in June 2008 and revised February 2021.