

July 1<sup>st</sup>, 2022

## **RESPONSIBLE MINERALS SOURCING POLICY**

As a responsible member of the global supply chain in high performance engineered materials and metals, ICD Alloys and Metals is aware of the risks of significant adverse impacts which may be associated with extracting, trading, handling, and exporting minerals from conflict-affected and high-risk areas (CAHRAs) and recognizes that we have the responsibility to respect human rights and not contribute to conflict or other forms of corruption. This is in accordance with U.N. resolutions, Section 1502 of the Dodd Frank Act and EU Regulation 2017/871. ICD Alloys and Metals will only purchase materials such as tantalum and tungsten from sources that are not involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings 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 (OECD Guidance) and listed here:

- Serious abuses associated with the extraction, transport, or trade of minerals:
- Any forms of torture, cruel, inhuman, 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.

In support of the above, all relevant ICD Alloys and Metals LLC personnel are directed to follow and be trained on procedures to implement a conflict minerals due diligence system designed to:

- Exercise due diligence with relevant suppliers consistent with the OECD Guidance and the Responsible Minerals Initiative's, Downstream Assessment Program (DAP) and encourage our suppliers to do the same.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm materials in our supply chain do not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of OECD Guidance.
- Establish long-term relationships with our immediate suppliers and counterparties.

- Support and build capacities of suppliers and counterparties to improve performance and conform to this supply chain policy.
- Suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.
- Immediately discontinue engagement with suppliers who pose a reasonable risk to be causing severe human rights abuses.
- Undergo regular DAP assessments to verify our conformance status 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 Responsible Minerals Initiative through its grievance mechanism that can be accessed [here](#).

If you have specific questions or would like additional information, please contact David Knudson, VP of Manufacturing at (336) 793-2222 or by email at [compliance@icdalloys.com](mailto:compliance@icdalloys.com).