

## Raw Material Policy for QSIL Metals Hermsdorf GmbH

This Policy is valid for the QSIL Metals Hermsdorf GmbH.

QSIL Metals Hermsdorf GmbH 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 QSIL Metals Hermsdorf GmbH 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) and that the applicable due diligence obligations and provisions are complied with, such as in particular under Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict-affected and highrisk areas. We are committed to avoiding the purchase of tantalum- and tungsten-containing material that may pose a risk of contributing to the harms listed in Annex II of the OECD guidance which 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 or compulsory labour
  - the worst forms of child labour
  - 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
- payment of taxes, fees and royalties due 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 for tantalum 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.

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

We aim to establish long-term relationships with our immediate suppliers.

QSIL Metals Hermsdorf GmbH 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:

<https://www.responsiblemineralsinitiative.org/rmap/grievance-mechanism/>

A handwritten signature in blue ink, appearing to read 'A. Dronhofer', written over a faint, illegible stamp or watermark.

Dr. André Dronhofer  
Managing Director  
January 1<sup>st</sup>, 2023