



Global Tungsten & Powders Corp. Public Due Diligence Report (“OECD Step-5 Report”)

FY2021-22 (March 1, 2021 – February 28, 2022)

The included Public Due Diligence Report, commonly referred to as the Step 5 Report is structured as closely as possible to the Public Due Diligence Report Writing Guidance of the Responsible Minerals Assurance Process (RMAP) published by the Responsible Minerals Initiative (RMI) at [Public Reporting \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org).

1) Company Information:

Company Name: Global Tungsten & Powders Corp.
RMI Smelter ID Number: CID000568
Company Location: 1 Hawes Street, Towanda, PA 18848, USA
3TG Material Processed: Tungsten
Webpage: [GTP | Global Tungsten & Powders Corp.](https://www.globaltungsten.com)

Global Tungsten and Powders Corp. (GTP) located in Towanda, PA, is a leading manufacturer of tungsten powders (APT, Oxides, Carbides, Tungsten Metal Powders) and semi-finished tungsten products. GTP is a wholly owned subsidiary of Austrian based Plansee Group, a privately held company located in Reutte, Austria.

GTP supports its customers to comply with SEC Conflict Mineral rule concerning Section 1502 of the Dodd-Frank Act in the United States of America and the European Regulation (EU) 2017/821 of the European Parliament and the Council of May 2017 expressing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold originating from conflict-affected and high-risk areas (EU Regulation).

The main sources of raw material to GTP’s tungsten smelter includes tungsten concentrates and tungsten containing secondary raw material (scrap). GTP also uses a minor amount of tungsten intermediates including sodium tungstate (ST), ammonium paratungstate (APT) and tungsten containing oxides (BTO/YTO).

GTP mainly sources tungsten concentrates from a group of tungsten mines around the world with which GTP has long-term supply agreements. Although GTP does not own a mine, GTP has actively been supporting the development of tungsten mines around the world through long-term commitments to buy (supply agreements) financial support (loans, bank guarantees, and government supported guarantees) and shares in a mining company. It is the strategy of GTP to mainly source tungsten concentrates directly from mines through long-term supply agreements. However, GTP also sources a smaller number of concentrates via traders who have agreements with smaller mines or have expertise in sourcing from regions of the world that require local presence to source responsibly. Thus, GTP has

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long-term supply agreements also with traders that focus on certain regions. GTP sources scrap directly from generators, customers, Plansee Group affiliates and scrap collectors and dealers.

As it is not possible to smelt tungsten in the same way as for other metals because the processing of tungsten concentrates in metal requires extensive processing, GTP and the tungsten industry as a whole, considers all tungsten containing scraps as conflict-free and are as such not discussed in the included report.

2) RMAP Assessment Summary:

The RMAP assessment firm SGS Global Services thoroughly reviewed GTP’s Responsible Sourcing Procedures and declared GTP is a conformant tungsten smelter. The status and the results of the previous assessment and the above listed assessment can be found at: [RMAP Conformant Tungsten Smelters \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org) and [Responsible Sourcing and Supply Chain Transparency | Global Tungsten & Powders Corp.](https://www.globaltungsten.com)

Date of last RMAP assessment	May 21-22, 2019
b. Assessment period	March 1, 2018 – February 28, 2019
c. Assessment firm	SGS Global Services

3) Company Supply Chain Policy:

As set forth in our Supplier Policy, Code of Conduct, and Raw Materials Supply Chain Policy, GTP and the Plansee Group are committed to responsibly sourcing all raw materials and require that all suppliers are committed to equally high standards.

GTP’s Supplier Policy and Code of Conduct are a part of GTP’s company management system. GTP is audited against ISO 9001, ISO 17025-Chemical, ISO 17025-Mechanical. Further details on GTP’s quality management systems and company process controls can be found at: [Quality & Certifications | Global Tungsten & Powders Corp.](https://www.globaltungsten.com)

Pertaining to Responsible Sourcing of raw materials, GTP implemented and published its first Conflict Minerals Policy on our website in 2013. Due to our own and GTP’s customers concern related to ensuring responsible sourcing from the Conflict Region, GTP did not source from the Covered Countries for several years. This decision was clearly stated in GTP’s first Conflict Minerals Policy. After thorough review and in consultancy with its customers and other stakeholders, GTP decided to change the policy in 2016 and started sourcing from the Covered Countries. Also, a new policy was implemented and published in 2016. In connection with the recent assessment under the Responsible Minerals Assurance Process (RMAP), GTP published a new Raw Materials Supply Chain Policy in May 2022: [Responsible Sourcing and Supply Chain Transparency | Global Tungsten & Powders Corp.](https://www.globaltungsten.com)

4) Company Management System Related to Responsible Raw Materials Sourcing:

Management System to Support Supply Chain Due Diligence:

GTP has structured its tungsten raw material procurement globally with a Director of Raw Material Sourcing & Planning, three Raw Material Purchasing Managers being responsible for the procurement of all tungsten raw material for GTP and two Strategic Raw Material Purchasing Analysts. The Director, Purchasing Managers and Purchasing Analysts are the gatekeepers for GTP and oversee that all purchases of tungsten raw material are fully documented and no conflict containing minerals enter the GTP supply chain. The Director and Purchasing Managers for GTP are extensively involved in conflict minerals issues prior to and during the implementation of the Dodd-Frank Act and have served as a board member of the TI-CMC since its initiation. The Raw Materials Purchasing Managers' report directly to the Director of Raw Material Sourcing & Planning. Maintaining a conflict free supply chain for GTP is part of the annual goals for the Purchasing Managers.

Controls and Transparency in the Supply Chain:

GTP primarily sources tungsten concentrates from larger mines with which GTP has long-term supply agreements. To ensure a stable supply of raw materials for its tungsten production and strengthen its engagement with suppliers, GTP has over the past 20 years actively been supporting the development of tungsten mines both via guaranteeing sale of products from the mines via long-term supply agreements as well as loans and guarantees. GTP conducts intensive reviews of all suppliers prior to entering into a supply agreement and all new and existing suppliers of tungsten raw materials are required to declare that they are committed to adhering to GTP's Supplier Policy, Code of Conduct and Raw Materials Supply Chain Policy.

GTP conducts intensive legal reviews of potential long-term suppliers both related to the mining company and the jurisdiction where the mining company is operating. Thus, GTP considers all supply from larger mines with which GTP has long-term supply agreements as low risk and limited review is conducted on individual shipments apart from regular finger printing. All supply from other sources requires further review by GTP, including full documentation on all shipments (e.g., original country of origin certificate from government or other official source; complete documentation on transportation from mine to GTP).

GTP uses SAP for tracking and recording of all raw material supplies from purchase (i.e., entering expected material in SAP), logistics (material receiving and sampling), analyses and consumption. GTP uses distinct part numbers for each raw material type, which ensures that purchased raw material type by purchase order is identical to received material type. The GTP receiving department is trained and highly experienced in identifying raw material types and any discrepancies are reported to the Purchasing Managers. All incoming tungsten raw materials are sampled and analyzed. GTP recently implemented an automated method for alerts of discrepancies between expected and actual received material quality. As one of the largest consumers of tungsten concentrates worldwide, GTP developed an extensive database of chemical analyses of tungsten and this database is used for regular screening and fingerprinting of incoming materials. All discrepancies between expected supply quantity and quality are treated as a "red-flag" and require further review prior to processing at GTP.

If GTP were to source material from a CAHRA we ensure this transaction is fully documented and traced using the iTSCi traceability program (bagged and tagged). During the reported period, GTP did not purchase any material from the so-called Conflict Region.

Occasionally, GTP sources intermediate and downstream tungsten contain products (ST, APT, oxide) from other tungsten smelters. GTP only sources these products from smelters validated under the Responsible Minerals Assurances Process (RMAP) [Tungsten Smelter List \(responsiblemineralsinitiative.org\)](#). As a major tungsten producer with long-term knowledge of the tungsten industry, and a member of the International Tungsten Industry Association (ITIA) and TI-CMC, GTP has market intel to independently review other smelters and the risk in their supply chain as it pertains to supply to GTP.

Any issues or concerns related to GTP's raw material supply including responsible sourcing concerns are to be reported directly to the Raw Material Purchasing Managers. In addition, GTP employees and other stakeholders can anonymously communicate their concerns related to GTP's sourcing through the GTP ethics hotline: [EthicsPoint - Global Tungsten & Powders Corp](#)

Any communications received are taken very seriously and are investigated and handled directly by a member of the GTP management team. Any concerns related to GTP's sourcing can also be reported to Responsible Minerals Initiative's public grievance site: [Grievance Mechanism \(responsiblemineralsinitiative.org\)](#)

Record Keeping:

All purchases and receipts of raw materials are recorded in the GTP SAP system. Upon arrival, each incoming lot of material is weighed, sampled and labelled with a material type number and a unique batch number, which is entered into SAP. Prior to entering the production plant, each lot must pass our quality control. Any potential quality and documentation "red flags" related to the material must be cleared. All relevant documents are stored within SAP.

For material from the so-called Conflict Region all tags are checked. The tags are stored in the Purchasing Department together with all the documents associated with each shipment.

GTP policy calls for a retention time of minimum five years for all essential documents.

5) Risk Identification:

The main sources of raw material for GTP's tungsten smelter includes tungsten concentrates and tungsten containing secondary raw material (scrap). GTP also uses minor amounts of tungsten intermediates including sodium tungstate (ST), ammonium paratungstate (APT) and tungsten containing oxides (BTO/YTO).

With respect to responsible sourcing of raw materials, GTP's main scope is on tungsten concentrates. As it is not possible to smelt tungsten in the same way as for other metals because the processing of tungsten concentrates in metal requires extensive processing, GTP and the tungsten industry, considers all tungsten containing scrap as out of scope for responsible sourcing of minerals. Thus, for scrap the

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only risk would be related to tungsten concentrates being sold to GTP as scrap, however this risk is very limited and would be detected immediately if not during sampling and visual inspection, during the analyses. GTP sources intermediate and downstream containing tungsten products (ST, APT, oxide) solely from smelters that are validated under the Responsible Minerals Assurances Process (RMAP): [RMAP Conformant Tungsten Smelters \(responsiblemineralsinitiative.org\)](http://responsiblemineralsinitiative.org)

In accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, GTP strongly condemns all activities, and will refuse any material, which we assessed benefitted or supported armed rebels/terrorist groups through illegal finance or other activities or involved serious human rights violations associated with the extraction, handling, transport, or trade of minerals, including:

- Serious abuses (i.e., torture, cruel, inhuman, and degrading treatment; forced for compulsory labor; worst forms of child labor; 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.

Procedure for Identification of Conflict-Affected and High-Risk Areas (CAHRA):

As part of the requirements of the Responsible Minerals Assurance Process (RMAP) and in-line with the OECD Due Diligence Guidance, GTP has implemented a procedure for identification of CAHRA and risk mitigation for contributing to violent conflicts and serious human abuse.

The GTP CAHRA identification procedure consist of two steps:

- 1.) Identification of country of origin and transit countries
- 2.) CAHRA identification using resources.

GTP is currently using 5 internationally recognized resources for identifying countries with suspected CAHRA:

- Heidelberg Institute for International Conflict Research
- RULAC: Rule of Law in Armed Conflicts
- Control Risk Maps
- CATO Institute; Human Freedom Index
- FATF-GAFI Organization

The included procedure is used for review of new suppliers prior to the material entering the GTP supply chain (suppliers as well as new mines from which existing suppliers are sourcing) as well as annual review of current suppliers. The annual review is conducted at the end of each financial year (i.e., end of February).

Know-Your Supplier (KYS) Process:

In addition to GTP's standard process for Supplier Selection and Qualification (Evaluating/Selecting Suppliers per ISO Standard), due to the additional risk related to responsible sourcing of tungsten concentrates further reviews and documentation is included in the selection of prospective new suppliers of tungsten concentrates. All suppliers of tungsten concentrates are required to complete an extended supplier form as well as sign a supplier declaration stating that any material sold to GTP is sourced according to GTP's Supplier Policy, Code of Conduct, and Responsible Sourcing Policy and will cooperate with requests for additional information on the origin of the product sold to GTP.

Based on the information provided above, GTP performs a check of all suppliers on national and international sanctioned parties and denied persons lists through the SAP Global Trade Services (GTS) compliance system. This screening covers official lists of the US, EU, Germany and other countries as updated from time to time. These measures provide additional assurances that GTP's business partners are not affiliated with terrorists, narcotics traffickers or any other illegal groups or persons of concern.

Scope of Risk Assessment:

GTP is especially concerned about any potential contribution to serious human rights abuse and other actions that benefit or support armed rebels/terrorist groups through illegal finance or other activities associated with the extraction, handling, transport, or trade of minerals.

GTP and the Plansee Group have strict rules and regulations when it comes to bribery and fraudulent misrepresentation of the origin of minerals, money laundering and non-payment of taxes, fees and royalties to governments. When it comes to misrepresentation of the country of origin of materials, GTP relies on official documents from government services in the country and with respect to payment of taxes, fees and royalties, GTP relies on these being paid if a government body issues an export document or country of origin certificate for the exported volume.

Identified Risks:

During the period covered under this report no major risks were identified.

With respect to the supply from the so-called Conflict Region in and around the DRC no required documents were missing, and all tags were provided with each shipment.

6) Risk Mitigation:

GTP's sourcing strategy with focus on larger mines and long-term supply agreements also when sourcing from artisanal or semi-artisanal mine, enables GTP to reduce the risk of contributing to conflict through its sourcing of raw materials. GTP's supply agreements provide contractual obligations for suppliers to adhere to GTP's Supplier Policy, Code of Conduct and Raw Materials Supply Chain Policy as well as the ability for GTP to reject any material that is not sourced according to these policies. GTP's supply agreements also provide GTP with the ability to seek damage for breach of these policies, strongly encouraging suppliers to ensure that all supply to GTP is in accordance with the agreement and GTP's policies.

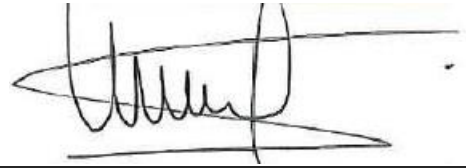
GTP's sourcing from the so-called Conflict Region in and around the Democratic Republic of Congo is conducted exclusively via one company with long-term presence and experience in the region. GTP only sources material that is fully documented and traced using the iTSCi-tagged material and GTP is based on recommendation from the RMI in the final stage of becoming a full-member of iTSCi.

7) Concluding Comments:

In the period reported in this 5-Step Report, GTP's review of Conflict-Affected and High-Risk Areas (CAHRA) of source and transit countries shows that the only CAHRA's identified were countries that were also identified under the Dodd-Frank Act as the so-called Conflict Region. All material sourced from the so-called Conflict Region (~1%) are 100% traceable from sources via the iTSCi upstream traceability scheme and fully documented through the transportation from the region to GTP.



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