



March 1, 2022

Disclosure of efforts taken by Global Tungsten & Powders (GTP) to eradicate slavery and human trafficking from its supply chain pursuant to the California Transparency in Supply Chains Act and the UK Modern Slavery Act

GTP is committed to responsible sourcing and supports the goals of legislation aimed at eradicating slavery, child labor and other forms of forced labor as well as human trafficking from supply chains, including the California Transparency in Supply Chains Act and the UK Modern Slavery Act. GTP takes a variety of measures, as described in below, to ensure that its supply chain is free of human rights abuses.

Our Commitment

Our Code of Conduct, Supplier Policy and Raw Materials Supply Chain Policy set forth our corporate commitments to ethical business practices, compliance with laws and respect for human rights. We are committed to providing a safe and healthy working environment for all our employees, and we ensure that every employee receives a fair compensation for his/her work. We also exercise due diligence to ensure socially and environmentally responsible sourcing of raw materials in our supply chain. Human rights abuses of any kind, including child labor and any form of forced labor, are expressly prohibited in our Code of Conduct, Supplier Policy and Raw Materials Supply Chain Policy.

Verification

GTP only does business with suppliers that respect human rights and share our commitment to compliance and ethical business practices. To ensure respect by suppliers and to enforce company policy, we incorporate compliance obligations into all commercial agreements and orders with suppliers, including in our general terms and conditions of purchase.

GTP is committed to recycling. The majority of our raw materials – tungsten and cobalt – are derived from scrap and secondary raw materials collected from downstream customers. The closed loop of recycling arrangements reduces the risk of human rights abuses in our supply chain as child labor, forced labor and similar violations of rights are more often associated with mining activities, particularly artisanal mining in conflict-affected and high-risk areas. GTP does procure a smaller proportion of its tungsten raw materials from mines in Europe, North America, Asia and Australia with whom we have long-term supply agreements. GTP conducts regular site visits to these mines and requires full visibility on mining, processing and transportation of the material from the mine to GTP.

GTP adheres to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and has established a company management system that requires due diligence measures that correspond to the risk profile of a transaction.

GTP routinely collects information from suppliers and performs the verification activities in purchasing including: supplier and subcontractor reviews, site visits and audits, declarations, reviews of country of origin and export documentation for all purchased tungsten concentrate, sanctioned party screening, records searches, chemical “fingerprinting” for purchased tungsten concentrates and other internal review and approval procedures. Additional details are available in our OECD Due Diligence Report.

Audits and Certifications

GTP participates in the Responsible Minerals Assurance Process of the Responsible Minerals Initiative and regularly submits to independent third-party audits of its purchasing activities in order to maintain conformant status with the Tungsten Protocol. GTP was the first tungsten company to be determined conformant under the RMAP standard (formerly CFSP) in May 2019, and GTP continues to engage in this independent assessment annually.

GTP requires suppliers, service providers and subcontractors to certify compliance with company policies and related laws and regulations and to provide information/documentation and allow for site visits as is necessary for GTP to conduct due diligence.

Internal Accountability and Training

Our Strategic Raw Materials Purchasing Manager, Mr. Cristian Kommer (Cristian.Kommer@globaltungsten.com) is assigned with responsibility for ensuring that all tungsten is sourced in a legitimate and ethical manner and according to our policies and procedures. All managers as well as employees in the purchasing department are required to participate in periodic trainings relating to the company’s Code of Conduct and other company policies and related laws and regulations. In case of concerns related to GTP’s sourcing and sourcing practices, all employees, suppliers, customers and other stakeholders are encouraged to contact GTP Towanda’s Strategic Raw Materials Purchasing Manager or may anonymously communicate concerns under a hotline (public grievance mechanism) maintained by GTP.

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Global Tungsten & Powders
1 Hawes Street
Towanda, PA 18848-2134
www.globaltungsten.com
Telephone (570) 268-5000
Fax (570) 268-5157