



Towanda, May 1, 2018

## GTP Conflict Minerals Policy

As one of the world's leading manufacturers of tungsten powders, Global Tungsten & Powders (GTP) is committed to responsible and conflict-free sourcing of raw materials at our group locations in Towanda/USA, Bruntál/Czech Republic, and Jyväskylä/Finland. Our Supplier Policy and Code of Conduct set forth our corporate commitments to ethical business practices and legal compliance, and we only do business with suppliers that adhere to these same commitments. Our plant with smelting/refining capacities in Towanda/USA avoids any intake of tungsten raw materials that directly or indirectly finance armed groups in conflict-affected or high-risk areas.

We have implemented a management system in accordance with the OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas to ensure that all tungsten containing or other relevant raw materials are sourced in a manner that does not support or benefit unlawful armed conflicts or contribute to serious human rights abuses or breaches in international humanitarian law.

GTP complies with relevant United Nations sanctions resolutions and, where applicable, the domestic laws implementing such resolutions, and we fully support the work of the Organisation for Economic Co-operation and Development (OECD) to avoid the use of raw materials that directly or indirectly finance armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries as well as any other conflict-affected or high-risk areas in the world.

GTP's conflict-free sourcing policies and measures include the following:

- Annual participation in the Responsible Minerals Initiative (RMI) independent third party audit that examines the purchasing activities, processes, and systems of our plant with smelting/refining capacities pursuant to the Responsible Minerals Assurance Process (RMAP) ([www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org)).
- Adhering to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and implementing corresponding controls, policies and procedures contained in our Conflict-Free Sourcing Manual, which include *inter alia* supplier declarations, audits, contractual flow-downs, country of origin and export documentation for all concentrates, internal chemical "finger-printing," as well as internal review and approval procedures.
- Conducting training programs for employees and disseminating policies to relevant stakeholders.
- Founding Member of Tungsten Industry – Conflict Minerals Council (TI-CMC) ([www.ti-cmc.org](http://www.ti-cmc.org)) with a continued commitment to make TI-CMC guidelines part of our tungsten sourcing strategy, culture and day-to-day operations.
- Cooperating with suppliers and customers to collect and process tungsten containing secondary materials (i.e. scrap and recycled materials).

A handwritten signature in black ink, appearing to read "H. Walser".

Hermann Walser  
President/CEO

A handwritten signature in blue ink, appearing to read "Karin Laursen".

Karin Laursen  
Strategic Raw Materials Purchasing Manager