



March 1, 2024

## **Global Tungsten & Powders LLC Public Due Diligence Report (“OECD Step-5 Report”)**

FY 2023-24 (March 1, 2023 – February 29, 2024)

GTP’s 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://www.responsiblemineralsinitiative.org).

### **1) Company Information:**

- a. Company Name: Global Tungsten & Powders LLC
  - b. CID Number: CID000568
  - c. Company Location: 1 Hawes Street, Towanda, PA 18848, USA
  - d. 3TG Material Processed: Tungsten
  - e. Report period: March 1, 2023 – February 29, 2024
- Webpage: [GTP | Global Tungsten & Powders Corp.](https://www.gtp.com)

### **2) RMAP Assessment Summary:**

- a. Last RMAP assessment: 10/26/23 – 10/27/23
- b. Assessment Period: 08/06/2022 - 08/31/2023
- c. Assessment Firm: Arche Advisors
- d. [Export All Conformant Smelters \(responsiblemineralsinitiative.org\)](https://www.responsiblemineralsinitiative.org)

### **3) Company Supply Chain Policy:**

- a. GTP has adopted a company policy for the supply chain of minerals originating from conflict-affected and high-risk areas. This policy was part of the recent RMAP assessment and is consistent with the OECD’s Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas, published in Annex II. Our policy is publicly available on our website.
- b. [Letterhead Outside \(globaltungsten.com\)](https://www.globaltungsten.com)

### **4) Company Management System:**

Our Strategic Raw Material Purchasing Analyst, Marie Girven (marie.girven@globaltungsten.com) is assigned with responsibility for ensuring that conflict minerals are sourced in a legitimate and ethical manner and according to our policies and procedures under supervision of Eric Rowe, the Managing Director Raw Material Sourcing & Planning. Cristian Kommer, the Manager Strategic Raw Material Purchasing and Mikael Aspfors, Head of Purchasing for Secondary Raw Material Sourcing and Planning are jointly responsible for

the procurement of all tungsten raw materials. If there are findings of actual or potential risks in the supply chain, the Raw Materials Purchasing Group is expected to communicate with senior management without fear of repercussion, to share information and support decision-making to maintain a conflict free supply chain. GTP has been extensively involved in conflict mineral issues prior to and during the implementation of the Dodd-Frank Act and has served as a board member of the TI-CMC since its initiation.

In the past year, GTP has implemented a procedure for continuous monitoring of the Due Diligence Management System.

#### Internal Systems of Control:

GTP conducts reviews of all suppliers prior to entering into a supply agreement and conducts cross checks against ITSCI reports and US Sanctions Lists. Suppliers are required to annually declare that they are committed to adhering to GTP's Supplier Policy, Code of Conduct and Raw Materials Supply Chain Policy. GTP also conducts intensive legal reviews of potential long-term suppliers related to the mining company as well as the jurisdiction where the mining company is operating. Furthermore, material in individual shipments (based on risk) is reviewed upon receipt from larger mines which includes regular finger printing. Supply from other sources requires 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). The GTP receiving department is trained and highly experienced in identifying raw material types. Any discrepancies are reported to the Purchasing Managers. All incoming tungsten raw materials are sampled and analyzed. All discrepancies between expected supply quantity and quality are treated as a "red flag" and require further review prior to processing at GTP. Supplier Due-Diligence performance is a common topic during negotiation calls. If a supplier's annual evaluation falls below a top tier ranking, they are required to issue a written response outlining any planned corrective measures. The GTP Ethics Hotline (public grievance mechanism) can be found on GTP's website ([Responsible Sourcing & Supply Chain Transparency - GTP | Global Tungsten & Powders](#)). This hotline is hosted by a third-party provider which acts as the intermediary between the whistleblower and the HR manager. The HR manager elevates the grievance in a top-down manner to the appropriate Management personnel.

#### 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 inspection plan which is also retained in SAP. GTP policy calls for a retention time of minimum five years for all essential documents. All relevant documents are stored within SAP. For any material from the Conflict Region, all tags are checked and stored in the Purchasing Department together with all the documents associated with each shipment.

## **5) Risk Identification:**

The GTP's procedure to define CAHRAs includes:

- If a country is included in Dodd-Frank Act, section 1502, GTP considers it a CAHRA
- If a country is included in the most up-to-date version of the EU CAHRA list, GTP considers it a CAHRA
- If a country is ranked High or Extreme on the RMI's Global Risk Map, GTP considers it a CAHRA
- If a country is not covered by the above resources, a credible alternative (per RMI's CAHRA website) will be used.

These resources are reviewed quarterly.

### Know-Your Supplier (KYS) Process:

GTP collects information of all third-party service providers through the following measures: identifying ownership and corporate structure; identifying related businesses; verification using reliable, independent source documents; checking government watch list information (e.g. UN sanction lists); identification of any affiliation of the company with the government, political parties, military, criminal networks or nonstate armed groups.

### Scope of Risk Assessment:

In accordance with OECD Guidance Annex II, GTP strongly condemns all activities and will refuse any material, which we believe benefitted or supported armed rebels/terrorist groups through illegal finance or other activities. GTP is especially concerned about any potential contribution to:

- serious human rights abuses associated with the extraction, transport, or trade of minerals
- direct or indirect support to non-state armed groups
- public or private security forces who illegally control the supply chain or illegally levy taxes along the supply chain
- bribery and fraudulent misrepresentation of the origin of minerals
- money laundering

### Identified Risks:

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

### On-the-ground assessments:

During the period covered under this report GTP personnel visited multiple European and Asian mines or pulled 3<sup>rd</sup> party Due Diligence reports.

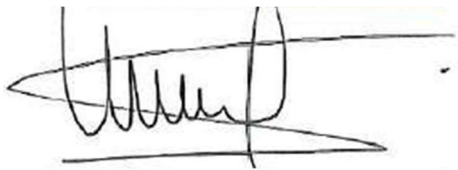
## 6) Risk Mitigation:

GTP's sourcing strategy includes periodic mine site visits, and use of government stockpile material. For intermediary materials, we only source from RMAP's conformant smelter list. GTP's Terms and Conditions 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. This also provides 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 has not sourced from the so-called Conflict Region in and around the Democratic Republic of Congo during this period covered under this report. Furthermore, GTP has no plans for sourcing from this region at this time. However, GTP continues to monitor the supplier pool and track activity in these areas just in case these plans change. As described above, GTP's actions to mitigate risks consist of remaining fully engaged in doing our own due diligence through both reputable sources of information and in person.

GTP mitigate, monitor, and evaluate risk in accordance with OECD Guidelines (Annex II). If these risk mitigation efforts fail, GTP will discontinue doing business immediately with vendors who are unsuccessful at meeting expectations.

## 7) Concluding Comments:

In the period reported GTP did not source from any recognized conflict regions.



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Director of Global Raw Materials  
Raw Material Sourcing & Planning