



March 4, 2025

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, 2024 – February 28, 2025
- f. Webpage: [GTP | Global Tungsten & Powders Corp.](https://www.globaltungsten.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)

The audit concluded without findings. Improvement opportunities were informally discussed between GTP and the Auditors.

3) Company Supply Chain Policy:

- a. GTP has adopted a company policy to avoid 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. The company is committed to maintaining a conflict free supply chain. Our policy is publicly available on our website: [Letterhead Outside \(globaltungsten.com\)](https://www.globaltungsten.com)

4) Company Management System:

Global Tungsten & Powders LLC. has structured responsibilities between tungsten raw material procurement team. Our Strategic Raw Material Purchasing Analyst, Marie Girven (marie.girven@globaltungsten.com) is assigned with responsibility for ensuring that raw materials 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 and report with senior management without fear of repercussion, to share information and support decision-making to maintain a conflict free supply chain. GTP Purchasing team has been extensively involved in monitoring the procurement mineral even prior to and during the implementation of the Dodd-Frank Act. GTP has served as a board member of the TI-CMC since its initiation.

In the past 2 years, GTP has implemented a procedure for continuous monitoring of the Due Diligence Management System. GTP added a training for Team Members to acknowledge Conflict Free Sourcing, and supporting and operating within the policy.

GTP follows OECD Guidance and RMAP Tungsten Smelter Standard and includes processes to identify conflict-affected and high-risk areas (CAHRAs), and supply chain risks worldwide, and describes relevant risk mitigation strategies. Effectiveness of the instruction is reviewed annually in March.

Internal Systems of Control:

GTP Supply Chain Policy is aligned with the OECD Guidance. GTP conducts reviews of all suppliers prior to entering into a supply agreement and conducts cross checks (D&B, SAP and Sanctions Lists (EU, U.S. OFAC). Suppliers 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 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 fingerprinting. 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. GTP has a continuous monitoring of the supply chain (Yearly interview: 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).

Grievance Mechanisms

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. Due diligence process applies to any material Received. The Purchasing Department reviews and stores all the documents associated with each shipment.

5) Risk Identification:

GTP has a robust process to identify risks in the supply chain. Our primary focus is on tungsten concentrates. Intermediates, if sourced, comes from RMAP compliant facilities.

GTP has also created a procedure to define CAHRAs:

- 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, US and OFAC)
- 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, South America and Asian mines or pulled 3rd 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, GTP only sources from RMAP's conformant smelter list. GTP follows a procedure to mitigate risks if a source is found to be in an identified CAHRA. GTP also performs an annual review of Reasonable Country of Origin to assess risk sources of supply.

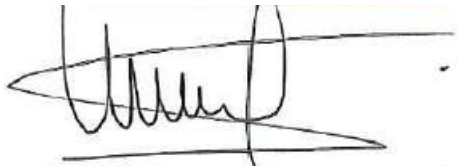
GTP Terms and Conditions provide contractual obligations for suppliers to adhere to GTP's Supplier Policy, Code of Conduct and Raw Materials Supply Chain Policy, and GTP can reject any material that is not sourced according to these policies. This also provides GTP with the ability to seek damage for 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 current plans for sourcing from this region. However,

GTP continues to monitor the supplier pool and track activity in these areas in the event 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 mitigates, monitors, and evaluates 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 monitored and evaluated risk and did not source from any recognized conflict regions. The primary raw materials for production were supplied from low-risk origins. For secondary materials, GTP confirms that the material being purchase and consumed is genuinely secondary in nature.



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