
Raw Material Policy for the TANI OBIS Group

Pol-Grp-004, 4, 2024-01-11

This policy is valid for the TANI OBIS GmbH, Germany and its affiliates TANI OBIS Smelting GmbH & Co.KG; TANI OBIS Japan Co. Ltd.; TANI OBIS Co., Ltd., Thailand and TANI OBIS USA LLC.

TANI OBIS Group is one of the leading global manufacturers of technology metals tantalum and niobium. We are committed to ensuring safety, health, and protection of the environment and of the people in contact with our products. As responsible corporate citizens, we pursue excellence in fulfilling governmental, industrial, and environmental standards worldwide. We are committed to comply to all relevant sanctions, in particular UN resolutions, as well as all national and international legislations, especially the REGULATION (EU) 2017/821 Supply Chain Due Diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

With this policy, we fully commit to the **OECD Due Diligence Guidance on Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**. As elaborated in Annex 2 of the guidance:

- We condemn all activities in connection to unlawful exploitation of mineral resources, no matter where such activities take place. Furthermore, we do not accept any forms of torture, cruel, in human and degrading treatment.
- We commit ourselves to avoid any measures that may help to finance conflicts.
- We don't accept any forms of forced or compulsory labor, which means work or service, which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily.
- We will not tolerate any direct or indirect support to non-state armed groups nor tolerate the support of public and private security forces exercising unlawful control over mining sites, transport routes, etc.
- We will not tolerate other gross human rights violations and abuses such as widespread sexual violence.
- We commit ourselves to avoid the worst forms of child labour in the supply chain according ILO Convention No.182
- We will not tolerate war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- According to our Code of Conduct, we do not accept bribes in any form and do not accept any form of money laundering in our supply chain.
- We urge all our suppliers and subcontractors to ensure all taxes, duties and royalties payable relating to the raw materials supplied to us.

In case we identify the aforementioned risks in our supply chain, we will immediately suspend or discontinue activities with such partners.

Moreover, we apply the Due Diligence Systems:

- for transparent commodity supply from **Conflict Affected and High Risk Areas (CAHRAs)** that meets the requirements of the OECD Guidance on Responsible Supply Chains of Minerals from Conflict - Affected and High - Risk Areas these are currently, but with limited acceptance the **International Tin Supply Initiative (ITSCI)** and the **Better Sourcing Program (BSP)** and
- of our own **Responsible Supply Chain Management (RSCM)**, an internal supplier qualification system to formalise supervision and selection of mining, as well as trading activities.

Resulting from the lack of reliable and acceptable due diligence systems in the DRC and Rwanda due to the escalating regional conflict, smuggling and illegal taxation issues, we have suspended raw

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material sourcing from these countries. We will continue to monitor the situation and will adjust our raw material policy as it deems appropriate.

We undergo a yearly third-party audit according to the assessment protocol designed by the **Responsible Minerals Initiative (RMI)** to maintain our Conformant Smelter Status.

We are committed to actively support our customers with their diligence and disclosure requirements defined in section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to “Conflict Minerals” and the regulations promulgated thereunder by the U.S. Securities and Exchange Commission.

With strong recycling activities and certified procurement, we ensure a conflict-free and sustainable raw material supply for our customers, following strong ethical, social, and environmental principles.

Where appropriate, we support our suppliers and the countries from which we source raw materials in implementing and enforcing the EITI criteria.

The commitment of this policy by our raw material suppliers is mandatory for the supplier qualification which take place before approval of raw material contracts.

Goslar, October 1st, 2024



Masafumi Ishii

Vice-Chairman & CEO

TANI OBIS GmbH