

Supply Chain Policy

CTIA GROUP LTD (hereinafter referred as CTIA or we) is a private organization operating, in the tungsten industry as a supplier of tungsten products, is highly committed to offering best working environment and opportunity for the employees, providing excellent products and service to our customers. We continuously drive sustainability in products and solutions, combining economic success, social responsibility and environmental protection in our business operations and thereby enable our customers to meet current and future needs of society.

Sustainable development along our supply chain is very important to us. For this reason, CTIA's management has decided to establish the following supply chain policy for the procurement of conflict minerals. We want to work with our suppliers to enhance their contribution to sustainability along our supply chain. Our <u>Supplier Standard</u> for Suppliers describes our expectations of suppliers in terms of their environmental, social and governance management policies. We have implemented obligations contained in the EU Conflict Minerals Regulation (2017/821), which sets out supply chain due diligence requirements for importers and processors of tin, tantalum and tungsten, their ores and gold originating from conflict-affected and high-risk areas (CAHRAs). CTIA sources tungsten metal products that are required for the manufacture of products for our customers from a wide variety of industries.

CTIA is committed to ensuring that human rights are respected and business ethics are observed in relation to the extraction, trade, handling and export of minerals from CAHRAs. Therefore, CTIA has adopted this Responsible Mineral Sourcing Policy and has committed to communicating it to suppliers as a common reference point for conflict-sensitive sourcing practices with the objective of promoting their risk-awareness. In all cases, this is in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.

In addition, CTIA undertakes to avoid all minerals that pose a risk of contributing to the harms listed in Annex II of the OECD Guidance:

- •CTIA undertakes to refrain from any action that contributes to the financing of conflicts and undertakes to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.
- Under no circumstances will CTIA tolerate, profit from, contribute to, assist with or facilitate the following actions carried out by any party:
 - Any form of torture, cruel, inhumane and degrading treatment;
 - Any form of forced or compulsory labour, child labour and slavery;
 - Other serious human rights violations and abuses, such as sexual violence;
- War crimes or other violations of international humanitarian law, crimes against humanity, or genocide.
- CTIA does not tolerate any direct or indirect support of non-state armed groups through mining, transportation, trade, transshipment or export of minerals.
- CTIA undertakes to refrain from any direct or indirect support of public or private security forces that illegally control mining sites, transport routes and upstream actors in the supply chain;



illegally demand levies, extort money or minerals at points of access to mining sites, along transport routes or at transshipment points; or illegally tax or extort intermediaries, export companies or international traders.

- CTIA will not offer, promise, give or demand bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and charges paid to governments for the purposes of mineral extraction, trading, handling, transportation and export.
- CTIA will support any and all efforts, or will take steps, to contribute to the effective elimination of money laundering where there is a reasonable risk of money laundering as a result of or in connection with the mining, trade, transshipment, transportation or export of minerals derived from illegal taxation or extortion at points of access to mining sites, along transportation routes or at transshipment points for upstream suppliers.

In order to ensure compliance with the obligations described above, CTIA will procure conflict minerals exclusively from RMI-listed producers or from producers who can present a valid CMRT. If the producer is not RMI-listed but submits a valid CMRT, additional contractual agreement will be concluded to implement CTIA'S requirements.

Appropriate measures will be taken immediately should CTIA identify one of the risks described above in the supply chain.

If you have any concerns about unlawful conduct or misconduct, please contact the appropriate CTIA Compliance Hotline, which is available at the following link: conflict-minerals@ctia.group

CTIA GROUP LTD JAN.5, 2023