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## Conflict Free Minerals Sourcing Policy

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### Conflict-Free Mineral Sourcing Policy

#### 1. Purpose

Powmet is committed to responsible sourcing and to ensuring that the minerals used in our supply chain do not directly or indirectly finance or benefit armed groups, contribute to human rights abuses, or violate applicable laws. This policy supports ethical business practices, supply chain transparency, and compliance with international standards.

#### 2. Scope

This policy applies to all suppliers, contractors, and business partners that provide materials or components containing minerals used in Powmet's business, including but not limited to:

- Tin
  - Tantalum
  - Tungsten
  - Gold
- (collectively referred to as "3TG")

#### 3. Regulatory and Standards Alignment

This policy is aligned with:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- U.S. SEC Rule 13p-1 under the Dodd-Frank Act (where applicable)
- Relevant international human rights standards

#### 4. Supplier Expectations

Powmet expects its suppliers to:

- Source 3TG minerals only from smelters and refiners that are validated as conflict-free through recognized industry programs (e.g., RMAP)
- Establish policies and management systems to support conflict-free sourcing
- Conduct appropriate due diligence on their supply chains
- Provide accurate and timely information upon request, including completion of the Conflict Minerals Reporting Template (CMRT)

#### 5. Due Diligence Process

Powmet will:

- Identify and assess risks in its mineral supply chain
- Engage suppliers to address identified risks
- Support continuous improvement in supplier sourcing practices
- Maintain records related to conflict mineral due diligence



#### **6. Non-Compliance and Corrective Action**

Suppliers that fail to meet the requirements of this policy may be required to:

- Implement corrective action plans
- Transition to conflict-free sources
- Risk suspension or termination of the business relationship in cases of continued non-compliance

#### **7. Reporting and Transparency**

Powmet is committed to transparency and will:

- Publicly disclose its conflict mineral efforts where required
- Cooperate with customers, regulators, and stakeholders on conflict mineral inquiries

#### **8. Continuous Improvement**

We recognize that responsible sourcing is an ongoing process and are committed to improving our practices through collaboration with suppliers, industry initiatives, and stakeholders.

#### **9. Policy Review**

This policy will be reviewed periodically and updated as necessary to reflect regulatory changes and best practices.

#### **Revision History:**

- 1/22/2026 - Created