

St Martin i.S., Austria, 27 May 2026

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ^[1]

Wolfram Bergbau & Hütten AG Due Diligence Report for Mineral Supplies in Year 2025 (“OECD Step-5 Report”)

Wolfram Bergbau & Hütten AG’s OECD Step-5 Due Diligence report for the year 2025 follows wherever appropriate the *Public Due Diligence Report Writing Guidance* of the Responsible Minerals Assurance Process of the Responsible Minerals Initiative (RMI) from 2018 and Annex IV of the *Responsible Minerals Assurance Process – Tungsten Smelter Standard* as revised on 7 February 2020. WBH also takes ITSCI’s e-mail on “OECD Guidance recommendation - Annual Due Diligence Report” from 2 March 2023 into account as well as the GRI^[2]-RMI Toolkit *Advancing Reporting on Responsible Mineral Sourcing* from 2019. Where appropriate, the current report follows closely the reports for the preceding years.

Overview

This report summarizes Wolfram Bergbau & Hütten AG’s due diligence for tungsten-bearing raw materials supplied to its Austrian refinery during calendar year 2025. WBH applies a risk-based responsible sourcing system aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and supported by the company’s internal management system, supplier requirements, site-level engagement and third-party assurance. The report covers the company’s supply chain policy, management responsibilities, control systems, risk assessment, risk management measures, stakeholder engagement and external audit results.

In 2025, WBH sourced primary tungsten concentrates solely from mines individually approved by the company, including supplies from Rwanda as the only active conflict-affected or high-risk (CAHRA) origin in its supply chains, and complemented upstream information with direct mine visits, plausibility checks and chemical fingerprinting. The company reviewed conflict-related developments in the eastern DRC, incidents reported through upstream mechanisms, sanction developments and other red flags, and implemented mitigation or follow-up actions where needed. WBH reports that no unresolved Annex-II risks were identified in its active supply chains and that corrective measures were taken in response to individual incidents and control weaknesses. The company also maintained RMAP conformance through an independent third-party assessment completed in July 2025.

As an OECD Step 5 report, this document is intended to provide transparent public reporting on the company’s due diligence approach, identified risks, actions taken and resulting conclusions for the reporting period. It therefore reflects the main elements expected from Step 5: disclosure of supply chain due diligence systems, description of risk assessment methods, summary of risk management responses, reporting on third-party audit status, and communication of relevant implementation outcomes. In this way, the report is designed to show not only that due diligence procedures are in place, but also how they were applied in practice during 2025.

^[1] OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing. In this report referred to as the OECD DD Guidance.

^[2] Global Reporting Initiative



1.) Company Information

Company name:	Wolfram Bergbau & Hütten AG
RMI smelter ID:	CID002044
Registered address:	Bergla 33, A-8543 St. Martin i.S., Austria
Refinery location:	Bergla 33, A-8543 St. Martin i.S., Austria
Processed material:	Tungsten
Report period:	Calendar year 2025 (1 January 2025 – 31 December 2025)
Webpage:	Home - wolfram

Founded in 1975 in connection with the newly discovered Mittersill tungsten deposit, Wolfram Bergbau & Hütten AG (WBH) is a world-leading vertically integrated manufacturer of tungsten carbide and tungsten metal powders. The company operates two facilities in Austria:

- a modern underground scheelite mine at Mittersill, Salzburg, and
- a state-of-the-art recycling, refining and powder manufacturing facility at St. Martin im Sulmtal, Styria, listed by the Responsible Minerals Initiative (RMI, formerly known as Conflict Free Sourcing Initiative, CFSI) under smelter ID CID002044.

Since 2009, the company belongs to the global Sandvik group, headquartered in Sweden, where it is part of the Business Unit (BU) Wolfram within Division Powder Solutions. Besides the WBH facilities in Austria, BU Wolfram comprises a tungsten recycling facility in Chiplun, India (zinc reclaim process) and Buffalo Tungsten, Inc., a US-based manufacturer of tungsten metal and carbide powders located at Depew, NY. The current report concerns exclusively Wolfram Bergbau & Hütten AG's refinery in Austria.

The company is not affiliated with any other companies using the name "Wolfram", as this is simply the name for the chemical element tungsten in many languages, e.g., in German, Russian or Portuguese.

In line with its Mission Statement, the company is committed to ensure best practice with respect to safety, health, environment and ethics at all stages of its supply and production chain. A sustained success of the company can only be built upon a sound foundation, which includes that governmental, industry and environmental standards are continuously met or surpassed.

WBH condemns all activities in the raw material sector connected to illegal or unlawful exploitation of ores, that directly or indirectly finances or benefits armed groups in conflict areas, or that contribute to serious human rights violations. The company fully supports the activities of the Organization for Economic Co-operation and Development (OECD) addressing these risks and has implemented the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (OECD DD Guidance). The company reviews and mitigates risks listed in the OECD DD Guidance, such as relating to security forces or money laundering, often referred to as the Annex-II risks.

WBH is supporting its customers to comply with the SEC Conflict Mineral rule concerning section 1502 of the Dodd-Frank Act in the United States of America and the European Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold originating from conflict-affected and high-risk areas (EU Regulation).

WBH is a founding member of the Tungsten Industry – Conflict Mineral Council (TI-CMC) and, based on annual independent 3rd party assessments, is listed as conformant to the Responsible Minerals Assurance Process (RMAP) assessment protocol since 2018 and before that, under the Conflict Free Smelter Program

since 2015. WBH is also full member of ITSCI (International Tin Supply Chain Initiative). Sandvik itself is a member of the Responsible Minerals Initiative (RMI).

WBH's products are tungsten metal powder (100% W) and tungsten carbide powder (94% W, 6% C). The company sources its tungsten raw material from

- its own mining operation,
- tungsten ore concentrates from mines worldwide,
- secondary raw materials ("scrap" and recycling materials), and
- if required, additionally from crude and refined intermediate products such as sodium tungstate, ammonium paratungstate (APT) and tungsten oxide (BTO, YTO).

Besides tungsten-bearing raw materials, carbon black is required for most of WBH's products as well as a few tonnes of dopant metals annually. Certain quantities of cobalt, tantalum and molybdenum-bearing by-products are generated during WBH's recycling and refining activities.

All suppliers are gauged against the Wolfram Supplier Code of Conduct, which sets standards ensuring labor rights, environmental protection, business ethics and conflict-free origin. It follows the Sandvik Supplier Code of Conduct, the latest version 3.1 of which was issued in 2024. As the Wolfram and Sandvik Codes are essentially identical, in the following, the acronym SSCoC is used for both, whichever is used in a certain context.

2. **RMAP Assessment**

The most recent 3rd party assessment against the Responsible Minerals Assurance Process (RMAP) – Tungsten Smelter Standard from 1 December 2017, revision 19 April 2023 was undertaken

- from 16 to 18 July 2025
- for the twelve-month audit period from 1 July 2024 to 30 June 2025
- by ARCHE Advisors, USA
- summary report: [Wolfram Public Report.pdf](#)

The audit was concluded without findings although two areas need to be addressed prior to the coming audit ("conform with continual improvement"). Other improvement opportunities were informally discussed between WBH and the assessment team.

On 16 October 2025, RMI/RMAP has been recognized by the EU commission as supply chain due diligence scheme under article 8 of the regulation (EU) 2017/821. This means that WBH's RMAP audit is recognized with respect to the company's obligations in relation to regulation (EU) 2017/821. However, the EU commission has not yet published a "whitelist" of global responsible smelters and refiners according to article 9 of the regulation.

3. **Company Supply Chain Policy**

Overview and History

The company's Supply Chain Policy is part of the overall company management system. WBH is audited against ISO 9001, 14001 and 45001 industry standards since 1994, 1999 and 2020^[3], respectively. The ISO 9001 management system of WBH ("QSGU system", in German) prescribes, besides others, the supply and production processes within the company, using a comprehensive set of policies, instructions and procedure documents. The most recent re-certification audit was undertaken by Intertek Certification

^[3] Prior to ISO 45001, the company was accredited to OHSAS 18001 from 2010 onwards.

GmbH, Germany, in July 2024 and the certificates are valid until 19 September 2027. The certifications were transferred to DNV Business Insurance, The Netherlands, effective 10 February 2026.

The first 'conflict mineral' procedures were introduced in mid-2014 under the original CFSP tungsten protocol. After the RMAP Tungsten Smelter Standard was revised in 2017, WBH issued the comprehensive instruction *WBH Management System for Responsible Supply of Tungsten Raw Materials (WBH-RSTM)* in January 2019. Following internal review, organizational changes and auditor recommendations from the 2020 assessment, an updated version (Instruction IMC/02) took effect on 1 March 2021. The current version is revision 5, dated 8 July 2025.

The instruction is fully aligned with the OECD Due Diligence Guidance and the RMAP Tungsten Smelter Standard. It defines processes to identify conflict-affected and high-risk areas (CAHRAs), assess supply chain risks worldwide and apply mitigation measures. Its effectiveness is reviewed annually.

WBH has been sourcing from what is now known as the Covered Countries in Central Africa since the mid-2000s; and supply chain due diligence, especially with respect to CSR issues like child labor and OHSE has been undertaken from the onset.

WBH has participated in the OECD Multi-stakeholder Forums on Responsible Supply Chains from the beginning, and on the ground, has taken part in early 3rd party efforts such as the Certified Trading Chain (CTC) program of the German geological survey (BGR). This included the very first CTC audit that was completed at one of WBH's cooperation partners in Rwanda already in 2010.

Supply Chain Policy

WBH publishes on its web page a Responsible Sourcing Statement, which is adapted from time to time to reflect the developments in the area of responsible sourcing of minerals:

[WBH-statement-of-responsible-raw-material-sourcing-26-jul-2024-.pdf](#)

WBH considers its concise Responsible Sourcing Statement a more effective way to promote compliance than reproducing the lengthy Model Supply Chain Policy in Annex II of the OECD Due Diligence Guidance. The statement summarizes all Annex-II risks and WBH's related responses and mitigation measures.

WBH believes Responsible Sourcing is an integral part of general CSR considerations. Obligations concerning responsible sourcing are also covered in the Wolfram and Sandvik Supplier Code of Conduct (SSCoC), which all suppliers must abide to, and which forms a part of all raw material supply agreements. The latest version of this code was published in 2024:

[english-supplier-code-3.1.pdf](#)

In the framework of supplier assessments, the suppliers are gauged against a list of zero tolerance criteria consistent with the Sandvik Supplier Sustainability Evaluation Procedure in January 2022.

4. Company Management System concerning Responsible Raw Material Supplies

Management Structure and Responsibilities

WBH is part of the Sandvik Group and belongs to the Powder Solutions Division within the Business Area Machining. The Manager International Mining & Raw Material Compliance (in the following Raw Material Compliance Manager) is responsible for implementing and overseeing WBH's raw material supply chain due diligence. As part of Governance & Regulations, in the specific function of Raw Material Compliance Manager, he reports to the Chief Financial Officer of the division. The function operates independently from, but in close cooperation with, WBH's purchasing unit and also works directly with logistics, quality control, production and sales.

The Raw Material Compliance Manager has over 35 years of experience in the mineral industry, 18 years of which have been in the tungsten industry, with a wide range of expertise in artisanal to industrial mining, mineral processing, metal accounting and the geology of ore deposits. Currently, he serves as chairman of the board of TI-CMC.

WBH-RSTM requires annual reporting on the management system's performance to the company president. The management team is kept informed about developments in responsible mineral sourcing. The instruction also includes a training schedule for relevant staff, while town hall presentations and newsletter articles raise awareness across the wider workforce.

Responsible sourcing has become routine for the staff involved, especially in purchasing and logistics. New employees in relevant departments receive this information during induction.

In 2025, WBH provided refresher training for staff who are involved in purchasing and handling of incoming tungsten raw materials. Three new employees, including the new Head of Governance & Regulations, were introduced to responsible sourcing requirements and procedures in two separate training sessions.

Internal System of Controls

WBH-RSTM instruction IMC/02, now in its fifth revision, forms the basis of the company's responsible sourcing practices since 2021 and the company's processes continue to be fully aligned with the OECD DD Guidance.

Together with the SSCoC, the WBH-RSTM specifies supplier selection criteria, minimum documentation needs, and raw material reception procedures. There are specific (stricter) requirements for supplies from CAHRAs, including mine site visits prior to the first delivery, annual re-visits, plausibility assessments and/or participation in an acceptable traceability program if available. WBH prefers direct interaction with the mine owners, even where purchasing is through traders and only accepts supplies from specific pre-approved mines. WBH does normally not purchase consolidated material, especially from CAHRAs, even if it is tagged by traceability providers. Reliance on upstream (assurance) programs such as ITSCI or Better Mining has been reduced over the years in favor of direct control.

As the only integrated tungsten producer outside Asia, WBH has extensive expertise in tungsten mining and beneficiation. Its technical cooperation with numerous suppliers also provides detailed insight into their operations and helps confirm the origin of the concentrates.

All supply agreements, purchase orders and/or pre-contract negotiations for mined material include relevant language assuring that

- minerals are exclusively mined at specific mines,
- WBH receives all required documentation, and
- WBH has the right to visit.

WBH reserves the right to return concentrates that do not conform to these requirements or where assembled information indicates a different origin than the agreed one.

Company procedures include a clearance procedure prior to utilization of the concentrates and internal "red flag" procedures.

WBH is a full member of ITSCI and all supplies from CAHRAs shipped in 2025 were covered by either the ITSCI or Better Mining traceability programs ("bag & tag") and associated due diligence, mine site baseline studies and shipment reports. WBH is augmenting this information with its own assessments, plausibility checks and chemical fingerprinting to assure correct performance of its supply chains. WBH strives for continuous improvement of working conditions and performance at the supplying mines.

Intermediates are exclusively sourced from smelters/refiners that are listed by the RMI as RMAP conformant tungsten smelters: [RMAP Conformant Tungsten Smelters](#)

In line with the company's purchasing policy, all supply agreements for raw material include mandatory acceptance with the SSCoC, which sets out minimum requirements concerning legal compliance and various CSR issues such as environmental and EHS performance, child labor and similar. Where relevant, additional language is added to purchase contracts or purchase orders.

WBH had first been audited by the Conflict Free Smelter Program (CFSP; now RMAP) in March 2015 and confirmed as Conflict Free Smelter. Successful re-assessments against first CFSP and later RMAP standards were undertaken annually since the first audit.

Finally, the current report, the Responsible Sourcing Statement (<https://www.wolfram.at/wp-content/uploads/2024/08/WBH-statement-of-responsible-raw-material-sourcing-26-jul-2024-.pdf>) and the description of Conflict Mineral handling on the company's webpage ([Global ores and concentrates | Wolfram](#)) provide additional transparency concerning the company's procedures and policies.

Grievance Procedure

WBH encourages all stakeholders along the supply chain to raise concerns regarding potential misconduct or breaches of applicable laws, regulations or the Sandvik Code of Conduct. Concerns can be reported directly to WBH under general enquiries ([Contact Wolfram tungsten powder experts | Wolfram](#)) or through relevant upstream assurance mechanisms, where applicable.

Stakeholders may also raise concerns confidentially through Sandvik's global Speak Up system ([Whistleblowing \(Speak Up\)](#)), which is available to both internal and external stakeholders and accessible via the Sandvik website. Reports can be submitted openly or anonymously, in line with applicable legislation. All reports are handled in accordance with established procedures, ensuring appropriate investigation and follow-up, while safeguarding confidentiality and protecting reporting persons against retaliation.

Record Keeping System

Since late 2015, all incoming shipments, inventory and feed of the plant with the various raw materials were documented in the MB Control system with quality parameter linked in from the laboratory and connected to the SAP system used for financial accounting. In April 2023, handling of incoming shipments and raw material inventories was moved to SAP.

All tungsten raw materials receive unique batch numbers at contract award, shipment notice or, at the latest, on arrival. Once assays are available and no compliance or technical red flags are identified, the material may be split into sub-lots and released for use. All relevant paper (as scans) and electronic records are stored in SAP. The IT department ensures the reliable and secure operation of the company's systems within the Sandvik IT environment.

For material from Central Africa, all tags are kept on site, and small back-up samples would allow forensic fingerprinting tests should there be doubt of the material's listed origin. Information from upstream mechanisms or 3rd party auditors, such as baseline studies or shipment-specific data, is kept on file.

All direct suppliers are registered in a master data file. Information about the individual mines, field visits and so on is available in hardcopy (field books), reports and e-mail notes; pertinent data is included in a formal register of all "permitted sources" and the supply chain maps.

All relevant documentation has a retention time of at least five years. The MB Control database is kept functional so that all existing data for shipments prior to the SAP migration remain accessible.

5. Risk Assessment

With respect to the responsible sourcing of raw materials, principal focus is on primary raw materials (tungsten concentrates). Intermediates are solely sourced from RMAP compliant facilities, and unless the company comes across any red flags, it will rely on the assessments of RMI. Material determined to be of secondary nature (recycling) is deemed to be outside of the scope of responsible sourcing of minerals.

When it comes to responsible sourcing of primary raw materials (tungsten concentrates) from areas considered to have an elevated risk profile, including but not limited to CAHRAs, the principal guideline for the company are the first two sentences of the introduction chapter of the OECD DD Guidance:

In conflict-affected and high-risk areas, companies involved in mining and trade in minerals have the potential to generate income, growth and prosperity, sustain livelihoods and foster local development. In such situations, companies may also be at risk of contributing to or being associated with significant adverse impacts, including serious human rights abuses and conflict.

The company applies reasonable risk management criteria while avoiding a broad boycott that would deprive local communities of livelihoods and development opportunities. The OECD Due Diligence Guidance focuses mainly on violent conflict and serious human rights abuses, including child labor, but also covers other Annex-II risks such as security forces, bribery, fraudulent misrepresentation, money laundering, and non-payment of taxes, fees and royalties. Additional supply chain risks, including labor rights and environmental performance, are addressed in the SCoC and related zero-tolerance criteria.

Identification of CAHRAs

While there are many sources that provide country scores for a wide range of CSR risks, the definition of what actually does constitute a CAHRA remains a matter of debate. According to the Regulation (EU) 2017/821, CAHRAs mean “Areas in a state of armed conflict or fragile post-conflict as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.”

WBH does not maintain a global list of CAHRAs but assesses locations of mines and production facilities, transit routes and business addresses of its actual supply chains against CAHRA status. This assures comparability and that definitions are up to date. For each new supplier and each new source (producer), affiliation to CAHRAs is verified, and all existing supply chains will be re-checked based on the supply chain mapping whenever new pertinent information is available (quarterly EU list updates (see below), reports on emerging conflicts) and at least annually.

For each country and where relevant, subnational unit identified as per the above, WBH will verify possible CAHRA-affiliation as follows:

- Check countries against list of “Covered Countries” under Dodd-Frank Act, section 1502;
- Check whether the area in question is included in the up-to-date version of the indicative, non-exhaustive and regularly updated list of CAHRAs published by the European Commission’s DG Trade (www.cahraslist.net) (EU list, established by RAND Europe); and
- Whether there are other factual circumstances that indicate that the area in question needs to be considered as CAHRA in relation to WBH’s supply chain.
- As final cross-check, WBH reviews relevant country profiles of Human Rights Watch to identify possible risk focus areas.

The second-last provision assures a swift reaction on emerging trends and includes issues like impact of smuggling across national borders.

RAND Europe's well-documented approach, which has been reviewed during an extensive public consultation, uses appropriate sources of information for the indicative, non-exhaustive list of CAHRAs. This is similar to WBH's original method and WBH considers it unnecessary to replicate such an approach in addition to RAND.

WBH is aware of possible weaknesses of public tools when taking scores at "face value". As the company visits all supplying mines by itself, it has, together with review of data provided by IPIS, ITSCI and the press in general, additional insight into the overall politics of the various countries in its supply chain.

The company does not consider the CAHRA affiliation to provide a simple black/white decision on further steps and therefore evaluates the risks for all its supply chains on an individual basis and applies individual rules to its supplies in line with these assessments. Responsible sourcing from CAHRAs provides development opportunities that can be critical building blocks to overcome the status of being a CAHRA. The company therefore supports responsible sourcing from these areas and through own site visits and direct collaboration with suppliers encourage continuous improvement of the conditions in the field.

As result of the above process, for supplies shipped in 2024, WBH classified one country of origin as CAHRA, namely Rwanda. Rwanda is not listed on RAND Europe's list of CAHRAs compiled for the EU Commission DG Trade, but it is included in the Covered Countries relating to the Dodd-Frank Act and there is an elevated risk of smuggling of concentrates from the neighboring DRC. WBH does currently not source from the Democratic Republic of Congo (DRC). As for transit countries, Tanzania is listed as Covered Country due to its border with the DRC. As transit is in sealed containers, we do not see any specific risk.

Know Your Counterpart (Supplier)

New suppliers will only be approved upon a formal KYC assessment, including verification against sanction lists via E2open (Amber Road / Trade Express / SAP-GTS) software. Existing suppliers are continuously monitored by E2open and documents are reviewed at least every three years. For private companies, WBH has to rely on collaboration with the supplier and observation of red flags. This said, many existing suppliers are either public mining companies, known trading houses and/or have been assessed by ITSCI or through third party audits. As RMI has ended recognition of ITSCI as upstream (assurance) mechanism, own KYC was extended to CAHRA exporters even if covered by ITSCI and to CAHRA mines. WBH is vigilant with respect to transport companies if risks are identified.

Scope of Risk Assessment

The company is particularly concerned about the possible link between the extraction and trade of minerals with serious human rights abuses, possible support of armed groups and illegal interaction of security forces and follows the recommendations of Annex II of the OECD DD Guidance.

Sandvik has strict anti-corruption guidelines and under no circumstances, the company will accept and offer bribes. The company notes that it might be difficult to identify corruption by upstream supply chain actors, and hence is vigilant to any signs of illegal activities, which comprises also money laundering.

With respect to payment of fees, taxes and royalties, the company has to rely largely on the effectiveness of government services: If a company is duly incorporated and obtains valid export papers from revenue authorities, WBH assumes that all relevant taxes are paid. In case of Rwanda, the introduction of the new mandatory INKOMANE software at the producing mines further enhances the control over official payments.

WBH supports the Extractive Industries Transparency Initiative (EITI). In 2025, only two active supply chains originated from EITI-implementing countries, representing 2.3% of total concentrate inflow. The

larger share came from an EITI-suspended country, while the smaller came from residual material linked to the future reactivation of a mine.

In general, with the supplying sources individually visited and approved as non-conflict-supporting by the company (which in CAHRAs is confirmed by third parties as well), the principal risk is that material from a non-approved site is mis-represented as approved material. To minimize this risk, in addition to traceability data supplied by upstream (assurance) mechanisms, the company undertakes plausibility assessments at the individual mine sites and uses chemical fingerprinting to compare incoming shipments with past deliveries. In 2025, additional on-site sampling was undertaken in Rwanda to better understand the relation between variability of natural ores and the impact of beneficiation on the fingerprint.

On-the-ground Assessments

The company aims to establish, respectively, in most cases has already established long-term relations with its suppliers. The company is interested in assessing additional opportunities, on which the successful approach of “help & check” could be applied. On-the-ground assessments, whether in CAHRAs or not, follow a guidance document that combines zero tolerance criteria of the SSCoC, OECD Annex-II risks as well as OHSE and technical / capacity parameter, including but not limited to:

- adherence to a strict “no child labor” approach,
- review how security is provided on site,
- ongoing plausibility of supplies (beyond tagging),
- continuous improvement with respect to OHSE, and
- technical cooperation to improve productivity.

Given the often many years of repeating visits, this is largely an informal process, which in CAHRAs is augmented by the third-party reviews by ITSCI, Better Mining or other consultants. Planned frequency of visits is guided by perceived risk and in CAHRAs, is at least once yearly.

The company contracts an experienced consulting geologist/engineer providing exploration services, training and advising on beneficiation and mining projects for various suppliers in Rwanda. He has been working since 2009 on behalf of WBH and undertakes also baseline studies for new potential suppliers. His presence provides additional oversight with respect to plausibility of the supplies.

WBH aims to visit all suppliers of mined products, regardless of the classification of the country of origin. Outside of CAHRAs, the company accepts trial deliveries before the initial visit from countries with known resources. Re-visit frequency depends on the perceived risk and location. Industrial mines in western countries are visited for further engagement with the supplier and to assess the supply risk itself or CSR risks outside the immediate “conflict mineral” agenda.

Identified Risks

Supplies from CAHRAs

Escalation of the Conflict in the Eastern DRC

In early 2025, the conflict in the Eastern DRC gained further momentum, with the non-state armed group M23 occupying first the capital of North Kivu (Goma) and in mid-February also the capital of South Kivu (Bukavu), both of which are major trading hubs for coltan and tin, and in case of Bukavu, also for tungsten.

Diplomatic efforts made little difference on the ground, and discussions on regional critical raw materials did not lead to visible progress.

Media reporting highlighted alleged smuggling of minerals from conflict-affected areas, notably coltan from rebel-held Rubaya, into Rwanda and possible misrepresentation as Rwandan origin. Some traders were suspended by upstream mechanisms, and sanctions were imposed on parties linked to the regional minerals sector.

There is no significant impact of the conflict in the Eastern DRC on day-to-day activities in Rwanda. The situation at the mine sites in Rwanda that are part of WBH's supply chains remains stable.

WBH took this context into account in its risk assessments and reinforced existing measures to ensure that only material from pre-approved and verified sources entered its supply chains. Own visits and plausibility assessments and verification of the shipments with help of chemical fingerprinting reasonably excludes the contamination by smuggled material.

The possible impact of international sanctions against various individuals and entities involved in the mineral business was constantly reviewed, and procedures adapted as required.

Incidents Listed by Upstream Mechanisms

In 2025, CAHRA sourcing was exclusively from Rwanda, where all active supply chains were covered by either the ITSCI or Better Mining upstream schemes. In total, supplies came from a limited number of approved mine operators and trading partners.

ITSCI reported a total of about 500 incidents in Rwanda for 2025, less than 20 of which relate to mines or negociants (local traders) in active WBH supply chains. Another 11 incidents were reported by Better Mining in relation to WBH supplies.

Several incidents were linked to a trading intermediary and related mainly to tagging or documentation issues, including discrepancies that raised smuggling concerns. WBH reviewed the affected chain, found its own supplies consistent with expectations, and is applying additional mitigation measures.

A small number of incidents involved site security or unauthorized mining activities. These were reviewed in cooperation with relevant partners and addressed in line with company procedures. There is no indication that any of WBH's supplies are linked to such activities. A large portion of the incidents concerned OHSE issues, which are outside of the Annex-II risk universe, and are addressed by WBH through site assessments and continuous improvement measures.

WBH reviewed all incidents in cooperation with relevant partners, implemented corrective and preventive measures where appropriate and confirmed that there were no indications of unresolved Annex-II risks in WBH's supply chains.

Results of Fingerprinting

WBH is using chemical fingerprinting to cross-check the documented origin of shipments. With respect to Rwandan supplies, fingerprinting results provide good confirmation of origin due to the typical chemical pattern provided by the combination of mineralogical composition and beneficiation route despite spatial proximity of the deposits. In 2025, we collected 49 samples of about 2 kg each on the ground, either from individual workings or from specific positions within the beneficiation circuit to better understand variability and specific patterns.

A very limited number of deviations were identified and corrective actions were undertaken.

We observed some particular trends at certain deposits, which were fully aligned with changes to the exploitation and beneficiation pattern. Well-explained gradual trends are considered an equally good support of origin as constant fingerprints.

Other incidents recorded

A trading partner was subject to international sanctions during the reporting period; appropriate actions were taken in line with the company procedures

Supplies from non-CAHRAs

Sixty tonnes of intermediates (three shipments) have been received that were manufactured by an entity downstream of the smelter level. Supplies are said to be from two RMAP-complaint smelters within the same group of companies. An independent confirmation is pending and the material has not been released for use.

OECD “Red Flags”

The OECD DD Guidance lists the following Red Flag conditions:

- “The minerals originate from or have been transported via conflict-affected and high-risk areas”
The origin from a CAHRA, for WBH in 2025 exclusively Rwanda, has been covered above. Supplies from Rwanda are usually shipped via Tanzania, which is classified as a Covered Country under section 1502 of the Dodd-Frank Act. Because shipments move in sealed containers and any repacking is supervised by a third party, and because there has never been any indication of tampering, WBH does not consider the shipping route to add risk.
- “The minerals are claimed to originate from a country that has limited known reserves, likely resources or expected production levels of the mineral in question”
All supplies to WBH originate from approved mines with full plausibility of their supply capacity.
- “The minerals are claimed to originate from a country in which minerals from conflict-affected and high-risk areas are known to transit”
This applies to the Mittersill mine as Rwandan concentrates transit Austria en route to the St. Martin refinery. WBH’s Mittersill supply chain is risk-free in this respect.
- “The company’s suppliers or other known upstream companies have shareholder or other interests in companies that supply minerals from or operate in one of the above-mentioned red flag locations of mineral origin and transit.”
This applies to two of our direct suppliers; however, as these are actually supplying the concentrates from their CAHRA affiliates to WBH in closed pipeline supply chains, and they do not have other tungsten producing entities, the risks are covered directly by the known CAHRA supply chains of the company.
- “The company’s suppliers’ or other known upstream companies are known to have sourced minerals from a red flag location of mineral origin and transit in the last 12 months.”
In 2025, WBH had four direct suppliers of tungsten concentrates from Rwanda, sourcing from a total of seven mines. All required Due Diligence is undertaken, as laid out before, and some of the chains are exclusive closed-pipeline supply chains.

One supplier also provides non-CAHRA material to WBH. WBH also sources from an international trader that may handle minerals from red-flag locations. In these cases, however, WBH receives distinct concentrates from western industrial mines, negotiated directly with the mines except for commercial terms. The concentrates are shipped directly from the producing sites to WBH. Except for one mine, WBH also received large volumes directly from the mines. Based on these controls, the risk of misrepresentation is minimal.

General improvement opportunities for incident identification

Two procedural improvement areas have been identified during 2025:

- Opportunities to further strengthen sanction screening alerts have been identified and are being addressed.
- We continue working to improve the accessibility of the Sandvik Speak-up portal to external stakeholders.

6. Risk Management

Risk Mitigation Strategy

A balanced approach is required in order to not apply de-facto boycotts on less developed mining areas, which would actually benefit from inclusion into the supply chain of an advanced Western offtaker, and the risk management of the company.

Principal risk mitigation of WBH is to accept only material from designated mines through selected suppliers. With respect to sourcing from CAHRAs (currently only Rwanda), WBH does not rely on third party baseline reviews alone but insists on direct mine visits. This precludes the use of material consolidated from various sources based on “bag & tag”. In Rwanda, WBH has high level of transparency over the individual production sites and working methods of our suppliers, beyond just total production numbers.

At the same time, ITSCI and Better Mining provide important information to assess the performance of the supply chains and of the situation and production figures in the area in whole. The company reviews incident reports and statistics and interacts with the traceability providers as required.

With all decisions, WBH must take the company’s position as a respected world-class supplier into account, as well as the possible impact on other supplies from CAHRAs: any contraventions that compromise directly WBH’s RMAP-compliant status and its understanding of Responsible Sourcing would lead to an immediate suspension of the supplies.

As the challenges are diverse and unpredictable, and the overall number of concerned suppliers limited, it appears unreasonable and unrealistic to have pre-defined risk management plans in place that would allow us to answer any imaginable risk in possibly not yet identified CAHRAs. The company has to rely on its ability to undertake risk management ad-hoc, upon very short notice, taking the guidance of the OECD into account.

In case that problems are identified, or red flags raised, depending on the magnitude of the case, either the President of the company or the Raw Material Compliance Manager will take the required decisions in coordination with other affected parties.

With the location of the current suppliers in mind, WBH does not expect to see direct support of warring factions or serious human rights violations on the mine sites as “likely risks” but is aware of the potential that one of the following might occur:

- (1) Identification of child labor,
- (2) Issues involving on-site security personnel,
- (3) Deterioration of company policies with respect to OHSE or record-keeping, and
- (4) Non-approved supplies entering the supply chain (misrepresentation of origin).

Issue (1) cannot be accepted and would require immediate rectification and consequences on site of the supplier to allow continuing offtake; issue (2) requires attention depending on factual circumstances; for issue (3), a solution would be sought through collaboration with the supplier (and it is generally not to be

classified as an Annex-II risk). Issue (4), the misrepresentation of origin involves the risk that material that indeed supports conflict or is related to serious human rights abuses is entering the WBH supply chain and requires detailed evaluation mandatory to assess and mitigate risks.

Based on its due diligence practices, WBH is reasonably assured that

- there is no child labor in our supply chains, and especially no cases of worst forms of child labor,
- while we highlight certain OHSE risks during the site visits, none of the supplying mines have OHSE issues that would fall under the zero tolerance criteria of the SSCoC, and
- WBH knows the origin of all incoming shipments in adequate detail, i.e., no cases of fraudulent misrepresentation have been identified.

With respect to incidents involving unauthorized mining in the vicinity of supplying mines, WBH discussed the matter in detail with various operators, who provided detailed insight into the risk mitigation already undertaken and planned.

Involvement of Affected Stakeholders

Aim of “Conflict Mineral” / Responsible Sourcing regulations is to protect the most vulnerable groups at or near the upstream end of the mineral supply chains: local miners, their families, and the population of the mining countries at large, from violence, human rights violation and child labor. With its purchasing policy, WBH tries to provide a positive impact:

- no general boycott of minerals from CAHRAs or artisanal and small-scale mining (ASM) as this would deprive the communities of income and the chance of development. Instead, the company allows for active sourcing when the supply chain fulfils ethical standards and does not support conflict.
- For approved supply chains, providing incentives to continuously improve the conditions on the mine site and to give a helping hand with respect to technical development.

Responsible sourcing depends on coordinated efforts across the supply chain, with clear responsibilities for each participant:

- Mine operators are expected to support stable, longer-term relationships that enable meaningful due diligence, practical collaboration and continuous improvement at site level, consistent with OECD expectations.
- Intermediaries, particularly exporting traders, are expected to provide timely and accurate information, maintain clear documentation, and apply traceability and reporting requirements with care and consistency.
- Where involved, upstream mechanisms are expected to provide credible oversight, timely information and continued procedural improvement in response to evolving risks.
- WBH continues to see RMI’s Responsible Minerals Assurance Process (RMAP) as a key framework to demonstrate conformance with the OECD Due Diligence Guidance. To remain effective, audit standards need to stay robust and credible while also being practical, timely and risk-based.

Downstream companies cannot expect absolute material assurance. An approach focused on risk avoidance rather than risk mitigation could undermine the formalization and development of ASM supply chains, harm vulnerable communities and weaken supply security.

WBH has seen support from direct customers for responsible sourcing from Central Africa. For this approach to remain viable, downstream companies need to continue accepting responsibly sourced material from CAHRAs and ASM, supported by confidence in the credibility of all involved actors.

Responsible sourcing also depends on rigorous smelter-level audits by qualified auditors being accepted across the supply chain. Audit reporting should provide meaningful information while protecting business confidentiality, as highlighted in regulation (EU) 2017/821, with full sourcing details available to regulators where required.

Access to RMAP should remain open to all entities that meet the smelter or refiner criteria and should not depend on unrelated ESG requirements that can be addressed through other frameworks.

Efforts to Track and Monitor Progress

Given the rather limited number of direct suppliers and underlying mines, tracking progress is largely an informal activity. The company maintains a register of approved (compliant) sources of non-secondary raw material for WBH's APT plant together with information about all mines with near-past and active supplying relation.

Suppliers (or underlying mines) that are found to compromise WBH's conflict free status, that fail the test against SSCoC zero tolerance criteria, or that refuse to cooperate with respect to continuous improvement of the OHSE conditions in supply chains, will be removed from the approved supplier base.

Observations concerning shortcomings and positive developments at the mine sites are included in site visit reports and other correspondence, which is backed up on the company's server.

7. Specific Information for 2025

WBH maintains a comprehensive register of all incoming tungsten-bearing raw materials, including concentrates, intermediates and recycling materials, with unique lot identification ensuring full traceability. During the reporting period, over 400 lots with highly variable individual tonnage from both internal and external sources were processed.

All active supply chains from CAHRAs are covered by upstream (assurance) mechanisms ITSCI or Better Mining, in addition to WBH's own assessment and plausibility visits, which address the Annex-II risks plus EHS "zero tolerance" risks based on the companies Supplier Code of Conduct. The company employs chemical fingerprinting of all incoming concentrate batches, which also allows to discriminate the various sources in Central Africa despite the very close spatial relation.

All CAHRA (Rwandan) supplying mines were visited in February/March 2025 and most again in November 2025, when also on-the-ground samples were taken to enhance the understanding of fingerprinting. In total, site visits in 2025 and 2026 covered 77% of the 2025-supplies. When including visits from 2022 to 2024, 99% of the supplies were covered. The remaining 1% comes from a western industrial mine that is currently being re-activated, and where remaining historic pre-concentrates were re-processed.

The company undertakes annually a detailed material balance calculation for the refinery at St. Martin, looking into physical material movement (tungsten units) across the fenceline: all raw material inflow (raw material and return shipments) is balanced with outflow (products, waste streams, material for pre-treatment, return of off-spec raw material) and internal stock movements. The balance for 2024 shows only a minor 0.4% deviation.

Incidents that lead to possible deviations from accepted practice and company expectations have been detailed under point 5. Risk Assessment / Identified Risks and 6. Risk Management.

In summary, WBH procedures provide a robust basis for assessing supply chain integrity and origin.

8. Legal Compliance with Regulation (EU) 2017/821

Regulation (EU) 2017/821 of the European Parliament and of the Council from 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold originating from conflict-affected and high-risk areas entered in full effect on 1 January 2021, and in Austria is implemented by paragraph § 222c of the *Mineralrohstoffgesetz* (law on mineral raw materials; MinroG), as published in the *Bundesgesetzblatt für die Republik Österreich* (Publication Organ for Federal Laws of the Republic of Austria) on 7 January 2021.

In Austria, in 2024, 12 companies have exceeded the thresholds for imports of gold, tantalum, tin, and/or tungsten according to the regulation and therefore have to report as Union Importers. WBH import figures for 2025 were reported on 8 March 2026 and subsequently successfully validated against the data of the customs authorities by the National Competent Authority (NCA).

On 16 October 2025, RMI/RMAP has been recognized by the EU commission as supply chain due diligence scheme under article 8 of the regulation (EU) 2017/821. This means that WBH's RMAP audit is recognized in connection with respect to the company's obligations in relation to regulation (EU) 2017/821.

9. Comments on Acceptance of supply chains from CAHRAs and Artisanal and Small-scale Mining (ASM) in general

The OECD DD Guidance highlights that mining of raw materials has the potential to generate income and provide development perspectives to the involved communities. At the same time, mining involves risks, from OHSE and to ethical issues. These risks must be mitigated. In contrast, pure risk-avoidance deprives also responsible miners, companies, communities and states from creating value. After more than ten years of advancing the journey to responsible sourcing through risk mitigation, 2024 appeared as turning point, where risk-avoidance seemed to gain momentum. This continued into 2025.

The critical view towards the Great Lakes region was augmented by reports of smuggling of concentrates from the rebel-controlled world-class coltan deposit Rubaya to Rwanda, where it is said to be misrepresented as of Rwandan origin.

Audits of the pinch point, i.e., the smelter-level, aim to provide reasonable assurance to the downstream companies that the upstream part of the supply chain works responsible. Where these audits are undertaken by qualified auditors based on widely accepted protocols, and overseen by a respected organization like RMI, the smelters undergoing these audits expect that the audit results are accepted by the downstream industry. Information-sharing has to take due regard for business confidentiality and other competitive concerns. Transparency is not a value by itself: If the pinch point facility has shared all information with the auditor, the audit determination should serve as firewall with respect to confidential sourcing information.

WBH started sourcing from Central Africa in the mid-2000s and has undertaken due diligence from the onset. One driver was to provide secure offtake for local suppliers against their commitment to continuous improvements, so that the local workforce benefits from the supply chain.

Over the years, WBH has obtained a good understanding of the specific conditions on the ground, and through technical cooperation, provided "help to self-help" – teaching simple solutions to improve productivity and safety without creating undue dependency on expensive first-world solutions.

WBH operates a modern underground tungsten mine in Austria and as the only vertically integrated producer of tungsten powders outside of Asia, and through numerous collaboration projects, has accumulated a wealth of experience in geology, mining and beneficiation of tungsten deposits, which we

share with our suppliers, small and big alike. This also leads to a more efficient utilization of the natural resource endowment in the producing countries.

WBH calls upon all stakeholders to support the overall goal of the OECD DD Guidance: A positive impact of mining and trade in minerals on livelihood and development while mitigating adverse impacts.

WBH sees various opportunities to improve the performance of the ASM sector in areas of elevated risk, including

- baseline studies that are truly informative including meaningful plausibility assessments,
- more attention to capacity building of artisanal miners and formalization of the sector,
- more consideration of the meaning of due diligence, taking into account the specifics of the individual supply chain,
- a level playing field, without unreasonably high thresholds and exceptions for downstream products,
- a fairer share in costs between up- and downstream for due diligence costs, and
- provision of a conducive environment by the individual governments, with harmonization of taxes and duties, adequate support functions for miners including training opportunities and knowledge centers, and elimination of bureaucratic hurdles that might hamper due diligence.

Long-term reliable relationships are essential for development. If mine operators, cooperatives or traders focus on short-term gains, downstream partners are less likely to invest in improvement. It also contradicts the call of the OECD to establish long-term relationships with suppliers. Besides, shorter supply chains help strengthen leverage over conditions at mine level.

Finally, it is of utmost importance that well-established and worldwide accepted supply chain due diligence schemes remain on one side recognized and on the other, continue to provide robust and reliable guidance and seek continual improvement of their procedures. WBH notes that Due Diligence does not mean material certification. The expertise built by responsible companies, auditors and independent industry schemes over more than a decade is an asset for all stakeholders.

Throughout the year, WBH was in close contact with various organizations to discuss responsible sourcing guidance. WBH will continue to work with all stakeholders to support robust and practical due diligence procedures. In Rwanda alone, in 2025, over 4000 miners were involved in the production of concentrates for WBH.



Steffen Schmidt, P.Geo. (PGO)

Manager International Mining & Raw Material Compliance
Wolfram Bergbau und Hütten AG