

Statement of Responsible Raw Material Sourcing

Wolfram Bergbau und Hütten AG (Wolfram) is a leading integrated producer of tungsten and tungsten carbide powders and operates a modern underground mine, recycling and refining operations in Austria.

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. We firmly believe that 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.

Wolfram 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.

Wolfram fully supports the activities of the Organisation 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 Guidance).

Wolfram is supporting its customers to comply with the SEC Conflict Mineral rule concerning section 1502 of the Dodd-Frank Act and the EU Conflict Mineral Rules 2017/821. Wolfram is a founding member of the Tungsten Industry – Conflict Mineral Council (TI-CMC, www.ti-cmc.org) and, based on an independent 3rd party assessments, is included in the **Conformant Tungsten Smelter List** of the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI, www.responsiblemineralsinitiative.org).

Besides recycling of secondary raw materials (scrap), Wolfram sources its raw material from its own mining operation, tungsten ore concentrates from mines worldwide, and intermediate products such as APT and YTO.

Wolfram considers all suppliers and the members of the underlying supply chains as valuable stakeholders in the overall process that leads to the success of the company. All suppliers are gauged against the Wolfram Supplier Code of Conduct, which sets standards ensuring labour rights, environmental protection, business ethics and conflict-free origin.

Based on recommendations in Annex II and the Supplement on Tin, Tantalum and Tungsten of the OECD Guidance, Wolfram has introduced a material management system entitled *WBH – Management System for Responsible Supply of Tungsten Raw Materials* (WBH-RSTM). It addresses the risks outlined in Annex II of the Guidance, namely

- serious human rights abuses associated with extraction, transport or trade of the minerals,
- direct or indirect support to non-state armed groups,
- the involvement of public or private security forces,
- bribery, fraudulent misrepresentation of minerals and money laundering, as well as
- adverse impact of non-payment of taxes, fees and royalties;

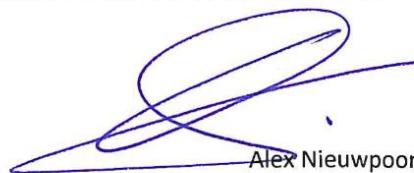
and, besides others, provides for

- identification, management and mitigation the above-mentioned risks,
- relevant consequences in case of non-performance of suppliers, including the supplier disengagement,
- on-site assessments of mines in the supply chain,
- Reasonable Country of Origin Inquiry,
- training in the various facets of responsible raw material sourcing for relevant employees, and
- verification of suppliers against relevant boycott lists.

Suppliers, customers and other stakeholders are invited to report grievances concerning Wolfram's sourcing practices and along Wolfram's supply chain either directly to office@wolfram.at or by using Sandvik's grievance mechanisms home.sandvik/speakup that is operated by a third party and guarantees confidentiality and anonymity.



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