

“Responsible Sourcing Policy”

Our Suppliers are expected to have and act with a "responsible minerals sourcing policy". As defined in the RMAP Standards, minimum expectations of a responsible minerals sourcing policy include:

- 1) the metal to which it pertains (3TG),
 - 2) consideration of all risks as listed in the OECD Annex II Model Supply Chain Policy (below),
 - 3) global scope, and
 - 4) clear and coherent system of risk management (risk identification, assessment and mitigation).
- OECD Annex II Risks can be broken into three overarching criteria: Human Rights, Conflict and Good Governance, including: Serious abuses associated with the extraction, transport or trade of minerals; Direct or indirect support to non-state armed groups; Public or private security forces; Bribery and fraudulent misrepresentation of the origin of minerals; Money laundering; Payment of taxes, fees and royalties due to governments.

This contractor and subcontractor shall abide by the requirements of 41 CFR 60-1.4(a); 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, or national origin. Moreover, these regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, gender, sexual orientation, gender identity, national origin, protected veteran status or disability.

Furthermore, the Supplier and all sub-tier Suppliers shall SOURCE RESPONSIBLY in accordance with both OECD and the EU Directive to better identify Conflict-Affected and High-Risk Areas.