

Responsible Minerals Sourcing Policy

October 20, 2020

This policy applies to the selection and retention of all Hoeganaes Corporation suppliers that provide materials containing tin, tantalum, tungsten, gold and/or cobalt.

Hoeganaes seeks to avoid sourcing minerals that contribute to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas (“CAHRAs”), including the Democratic Republic of the Congo (“DRC”) and DRC-adjointing countries. Armed groups operating in the eastern DRC have engaged in conflict and severe human rights abuses, fueled through proceeds from the mining or trade of so-called “conflict minerals” or 3TGs (tin, tantalum, tungsten and gold). These atrocities led to the creation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, built on the framework of the UN Guiding Principles on Business and Human Rights.

Hoeganaes is committed to responsible sourcing of 3TG minerals. Tantalum, tungsten and gold are not present in any Hoeganaes products, whereas tin is present in select customer premixes. Hoeganaes global suppliers that source raw materials containing tin are required to:

- Adopt policies and due diligence management systems consistent with OECD Guidance to identify, prevent and mitigate risks associated with tin, as well as require their suppliers to adopt similar policies and practices.
- Provide Hoeganaes information on the presence of requested 3TG minerals in their products and data on the smelters and refiners in their respective supply chains, consistent with the industry standard for Supply Chain Transparency provided in the Conflict Mineral Reporting Template (CMRT) as developed by RMI.
- Procure, directly or indirectly, from smelters and refiners validated under the Responsible Minerals Assurance Process (RMAP) of RMI or other recognized third-party audit / validation programs (for suppliers whose sourcing originates from the DRC, adjoining countries or other CAHRAs).

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