



RESPONSIBLE MINERALS SOURCING POLICY

Applies To :

This policy applies to the selection and retention of all GTG direct (or “tier one”) suppliers that provide materials that contain tin, tantalum, tungsten, gold and/or cobalt.

Introduction and Background or Purpose :

GTG takes a holistic approach to the responsible sourcing of minerals. GTG 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. GTG also seeks to avoid harming communities in CAHRAs through de facto embargoes of minerals sourced from those areas.

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. Legal requirements have followed, requiring certain companies to disclose their due diligence consistent with the OECD Guidance, mitigating the risk that the 3TGs they purchase may directly or indirectly fund conflict in the DRC, adjoining countries, or other high-risk areas of the world. At the same time, companies are expected to source responsibly from these areas to avoid a de facto embargo, which can have significant adverse impacts or unintended consequences for artisanal miners and their families whose livelihood depends on the mining industry.

Similar concerns have arisen surrounding the social and environmental impacts of cobalt extraction, including child labor and unsafe working conditions in artisanal cobalt mining in the DRC. The Responsible Business Initiative (RMI) added cobalt as a dedicated focus area in 2017. RMI is working to assist companies in exercising due diligence over cobalt supply chains in accordance with the OECD Due Diligence Guidance.

GTG deplores the violence and inhumane treatment in the DRC, adjoining countries and other parts of the world. By adopting this Policy and collaborating with our customers and suppliers, especially through RMI, GTG is working with others to promote responsible business practices and foster peace and prosperity, which is consistent with GTG values.

Requirements :

GTG is committed to responsible sourcing of minerals, including 3TG and cobalt, using the OECD due diligence framework, so as not to support conflict or human rights abuses in the DRC region or other CAHRAs, while avoiding de facto embargoes. This position is consistent with GTG’s Human Rights Policy, Supplier Responsibility Code and GTG’s respect for human rights in our own operations and our supply chains, as well as with the OECD Due Diligence Guidance and UN Guiding Principles.





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GTG global suppliers are required to:

- Per GTG's relevant Contract agreement templates and U.S. purchase order terms & conditions; Supply materials to GTG that are "Conflict-Free," meaning minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo, adjoining countries or any other CAHRAs as determined by regulatory bodies and as applied by RMI.
- We expect our suppliers to be transparent and responsibly source from the DRC, adjoining countries, and CAHRAs, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems consistent with OECD Guidance to identify, prevent, mitigate and, where appropriate, remediate risks associated with minerals, including 3TGs and cobalt, as well as require their suppliers to adopt similar policies and practices. GTG expects suppliers to cooperate with GTG in evaluating compliance with these requirements.
- Provide GTG information on the presence of requested minerals, including 3TGs and cobalt 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) or Cobalt Reporting Template (CRT) 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).
- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation or non-conformance with GTG's policy.
- Collaborate with others on cross-industry efforts, such as with RMI, to support responsible minerals sourcing, including on-going education and training.

