

## QuantumClean's Conflict Minerals Sourcing Policy

Mined materials such as columbite-tantalite (coltan), cassiterite, wolframite and gold, or their derivatives, including tantalum, tin, and tungsten, originating from Conflict-Affected and High-Risk Areas (CAHRAs) such as the Democratic Republic of the Congo (DRC) and adjoining countries are sometimes mined and sold by armed groups to finance unfair labor practices or human rights violations. Some of these minerals and/or derivatives can make their way into the supply chains of the products used around the world. While QuantumClean does not source mined materials, we do recover these materials as a service and supply them back into the supply chain. It is our policy to avoid recovery of conflict minerals that directly or indirectly finance or benefit armed groups from conflict-affected regions.

As part of QuantumClean's commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is QuantumClean's goal to seek to only recover raw materials containing conflict minerals, including Ta, which do not support conflict.

In support of this sourcing policy, QuantumClean will:

- i. Exercise due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) and require our suppliers to maintain a publicly available policy on responsible sourcing that aligns with OECD Guidance
- ii. Provide, and require our suppliers to cooperate in providing, due diligence information to confirm the conflict minerals, including Ta, in our supply-chain that are sourced from CAHRAs are responsibly sourced
- iii. Immediately discontinue engagement with suppliers who do not support CAHRA due diligence of their suppliers
- iv. Collaborate with industry associations such as Responsible Minerals Initiative (RMI) to ensure solutions are in place that enable responsible sourcing and through the Responsible Minerals Assurance Process (RMA) certify QuantumClean as a conflict free smelter for the secondary materials we recover and return to the supply chain
- v. Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders and the public as required.

Policy Established: May 2013

Policy Revised: July 2019