

PROCEDURE TO IDENTIFY CONFLICT-AFFECTED AND HIGH-RISK AREAS

1. Purpose

The purpose of this procedure is to identify conflict-affected and high-risk areas (CAHRAs) that may exist in our tantalum supply chains.

This procedure will be applied to supply chains (i.e., material, transit routes, suppliers) of all mined tantalum or refinery sources.

2. Definition of CAHRAs

CAHRAs are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuse and violations of national or international law.

3. Step 1: Identify CAHRAs

Using information obtained through the Know Your Counterparty (KYC) of all its suppliers, including origin and transit route for all primary material, Compliance Officer will identify and evaluate all countries in its supply chain for each of the following three supply chain elements:

- Material origin
- Material transit route
- Supplier or beneficiary location

CAHRAs will be identified using the following indicators in the [RMI's Global Risk Map Tool](#)¹ to evaluate listed risk of harm for each of these supply chain elements:

- **RMI:** This provides a weighted risk level based on the following risks of harm:
 - **Conflict:** Presence of armed conflict and widespread violence. Direct or indirect support to non-state armed groups, or public or private security forces.

¹ The RMI's Global Risk Map, is a risk assessment tool that allows users to identify and compare governance, human rights, and conflict risk indices across geographic regions globally. Utilizing the internationally recognized indices and resources identified in the European Commission's [non-binding guidelines for the identification of conflict affected and high risk areas and other supply chain risks](#), the tool classifies geographic areas as low-, medium-, high-, and extreme-risk in an interactive and up-to-date world map.

- **Governance:** Bribery, fraudulent misrepresentation of the origin of minerals, money laundering, Non-payment of taxes, fees, and royalties to government. Governance, with a focus on corruption or to the extent that public power is exercised for private gain. Direct or indirect support to public or private security forces.
 - **Human Rights:** Serious human rights abuses (torture, cruel, inhumane and degrading treatment; forced labor; worst forms of child labor; sexual violence; war crimes)
- **Conflict Affected and High-Risk Areas:** The indicative, non-exhaustive and regularly updated list of CAHRAs recognized by **European Union**
- **Dodd Frank Act Countries:** List of countries that require compliance under the Dodd Frank Act Section 1502

A country or region will be considered a CAHRA if it is ranked

- High (2.50-4.99) or
- Extreme (0 -2.49)
- on RMI’s Global Risk Map Tool.

If a country is not covered by the RMI Global Risk Map Tool, a credible alternative that covers the associated risk of harm per RMI’s [CAHRA website](#) will be used.

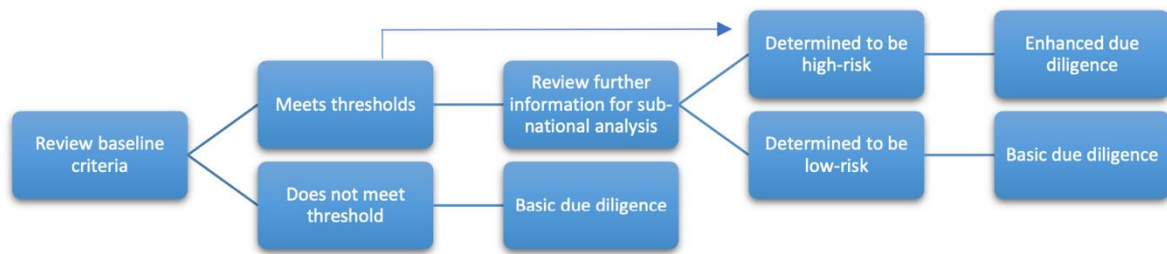
4. Step 2: Identify the type of Annex II risk(s) of harm that trigger the CAHRA classification

Using the **filter** function on the RMI Global Risk Map Tool, evaluate the subject country/countries for the following Risks:

- Conflict: RMI
- Governance: RMI
- Human Rights: RMI

Identify each risk that ranks high or extremely high for each CARHA. Maintain screenshots of RMI Global Risk Map Tool as evidence of the determination for each risk evaluation.

5. **Step 3: Final Risk Classification** The final risk-determination is made by the Chief Compliance Officer based on the credible primary and supplementary resources using the following decision tree. Such determinations are fully documented.



6. Step 4: Map High-Risk Supply Chains

If any of the following conditions exist, further assessment will be conducted beginning with completing a supply chain map (See *Procedure to Identify Material-Related Red Flags and Supply Chain Risks*, *Procedure to Know Your Counterparty* and *Procedure to Identify Material-Related Red Flags Procedure*):

- The minerals originate from or have been transported via a CAHRA.
- The minerals are claimed to originate from a country where materials from CAHRAs areas are known to be transit, legally or illegally.
- The company's suppliers or other known upstream companies have shareholders or other interests in companies that supply minerals from or operate in a CAHRA.
- The company's suppliers and/or other upstream companies are known to have sourced minerals from or transported minerals through a CAHRA in the last 12 months.

Results of the CAHRA identification procedure will be recorded in the CAHRA Tracker.

NOTE: All CAHRAs in our supply chain will be evaluated for risks in accordance with the *Procedure to Identify Supply Chain Risks*.

7. Frequency

This procedure will be completed annually or when new sources of material, transit routes or suppliers are identified in a subject tantalum supply chain.

Effective date: 2/22/22 for this revision.

REVIEWED & APPROVED: 12/18/2024