

## Supply Chain Policy Statement

December 18, 2024

### 1. Company Information

Telex Metals (TM) was established in 2010 as a minor metals company. The company has a tantalum processing facility located at 105 Phyllis Drive, Croydon, PA. 19021. In 2013, TM established a Supply Chain Policy compliant to the (then) EICC-CFS-CFSP standard. TM now adheres to the Responsible Minerals Initiative/Responsible Minerals Assurance Process (RMI-RMAP Tin & Tantalum Standard, Effective Date: June 1, 2018 (with minor revisions 19, April 2023)). The company RMI number is CID001891.

### 2. RMI – RMAP (formerly CFSP) Assessment Summary

TM will undergo annual independent third-party assessment/audits of the RMI-RMAP Protocol to remain compliant. The assessments are valid for one year.

### 3. Company Supply Chain Policy

TM developed a Supply Chain Policy effective 8/13/12 to assess risk. This policy was reviewed & updated 12/18/2024 to be fully aligned with the 3<sup>rd</sup> edition OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA-OECD Guidance. The policy covers risks identified in Annex II of the OECD Guidance. Specifically,

- 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

The policy was reviewed and approved by senior management, which is committed to supporting its implementation. TM also fully supports the Extractive Industry Transparency Initiative (EITI). The supply chain policy is listed on the website: [kymerainternational.com/policies-quality-assurance/ Telex Metals](http://kymerainternational.com/policies-quality-assurance/Telex%20Metals). All Sales Orders reference this policy.

### 4. Company Management System

#### A. Management Structure

Our Management Team oversee the due diligence program & implementation. The General Manager (GM) has direct responsibility for the RMI program, which includes implementation of the process and all the required training associated with the program. Training is conducted annually for key staff from all relevant departments.

#### B. Internal Systems of Control

The due diligence system & process is aligned with the OECD Guidance and RMAP. Origin Determination for Intermediates (I) and Secondary Materials (SM) are in accordance with Annex II- Table 10 (for I), and Annex V of the RMAP Tin & Tantalum Standard (for SM), Effective Date June 1, 2018. (minor revision 19, April 2023)

#### C. Record Keeping System

All records relating to the due diligence program are maintained and properly stored for at least five (5) years.



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## 5. Risk Identification

The company has a robust process to identify risks in the supply chain. TM has a specific policy for Conflict Affected-High Risk Areas (CAHRA) and expects its suppliers to comply. The CAHRA procedure is listed on the website as well. TM conducts the basic "Know Your Counterpart" (KYC) screening throughout the supply chain and expects suppliers to do the same. TM does not purchase ore. All Intermediate Tantalum containing materials, as defined in the RMAP Standard, comply with Annex II & V and are solely sourced from RMI-RMAP compliant smelters. All Secondary Tantalum containing materials are fully compliant and consistent with the definitions listed in RMAP Annex V: Tantalum Material Type. All the risks have been identified and are compliant with the procedures and audit protocols stated herein.