



## **GTP Conflict-Free Tungsten Sourcing Policies and Measures**

As one of the world's leading manufacturers of tungsten powders, GTP is committed to responsible and conflict-free sourcing of raw materials. Our Supplier Policy and Code of Conduct set forth our corporate commitments to ethical business practices and legal compliance, and we only do business with suppliers that adhere to these same commitments. GTP has implemented a supply management system based on our Supplier Policy and Code of Conduct to ensure that our tungsten raw material is sourced in a manner that does not support or benefit unlawful armed conflicts or contribute to serious human rights abuses or breaches in international humanitarian law. GTP fully supports the humanitarian goals of Section 1502 of the Dodd-Frank Act and is prepared to assist our customers in their efforts to comply with the conflict mineral rules adopted by the U.S. Securities and Exchange Commission.

GTP's conflict-free tungsten sourcing policies and measures include the following:

- Sourcing of tungsten concentrate from 7 mines in Europe, Asia and the Americas with whom we have long-term supply agreements. GTP conducts regular site visits to all mines and requires full visibility on mining, processing and transportation of the material from the mine to GTP.
- Processing of tungsten containing secondary materials (i.e. scrap and recycled materials) which are conflict-free under the SEC rules.
- No sourcing of concentrate from any country in Africa.
- Sourcing of concentrate from the US Government via the Defence Logistics Agency (DLA) stockpile. DLA stockpile material is considered legacy material and considered conflict-free under the SEC rules.
- Implementation of the controls, practices and procedures contained in our Conflict-Free Tungsten Sourcing Manual, which includes *inter alia* supplier declarations, country of origin documentation/certificates and export documentation for all purchased tungsten concentrate, blacklist screening of suppliers, records searches, GTP's chemical "fingerprinting," and internal review and approval procedures. Please see attached a statement from Andreas Lackner, President and CEO of GTP, setting forth the background for this new system.
- Participation in an independent third party audit under the Conflict Free Sourcing Initiative (CFSI) jointly developed with the Tungsten Industry – Conflict Minerals Council (TI-CMC) and the Electronic Industry Citizenship Coalition (EICC).