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Conflict Mineral Policy

As one of the leading Ferro Tungsten producer in China. Hunan Chuangda Vanadium Tungsten Co., Ltd. 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. Chuangda insists to use the Tungsten raw material of Concentrate from China. Most of material is coming from the Hunan mine area—Shi Zhuyuan, Xin Tianling and Yao Gangxian, It is not only because the convenient of transportation, but also because the top quality of Hunan Tungsten resources. We have implemented a supply management system based on our supplier Policy and code of conduct to ensure that our tungsten raw material is not sourced from Africa country.

Chuangda's conflict -free Tungsten sourcing policies and measures inclide the following:

- -No concentrate sources from any Africa country.
- -Implementation the conflict-free Policy and let all of purchase activity is controllable and visible. We prepared to assist our suppliers and customers joint the TI-CMC.
- -Processing of Tungsten containing secondary materials(i.e. Scraps and recycled materials) which are conflict-free under the SEC rules.
- -The source of Tungsten concentrate from 5 Mines in China with whom we have long-term supply agreements. Chuangda conducts regular site visits to



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all mines and requires full visibility on mining, processing and transportation of the material from the mine to Chuangda.

-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).