

09/19/2022

**Procurement Policy regarding Conflict Minerals and Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010**

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require manufacturers who file certain reports with the SEC to disclose whether the products they manufacture or contract to manufacture contain “conflict minerals” that are “necessary to the functionality or production” of these products.

“Conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite (coltan), and wolframite, regardless of where they are sourced, processed or sold. Elmet seeks to avoid sourcing minerals that contribute to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas (“CAHRAs”), including the Democratic Republic of the Congo (“DRC”) and DRC-adjacent countries. Only sources with current approvals per RMI Approved Smelter List are used.

Pursuant to Section 1502 (“the Provision”) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Act”) (Pub. L. 111-203, 124 Stat. 1376, July 21, 2010) also referred to as the “Conflict Minerals Act”, Elmet Technologies only purchases “DRC conflict-free” minerals from smelters on the Conflict-Free Smelter Program (CFSP) Compliant Smelter list. Elmet Technologies is committed to a socially responsible supply chain that, among other requirements, is conflict-free. The issues addressed include Human Rights, Conflict and Good Governance, including: 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.

To this end, we continue working with our supply chain to strengthen compliance and ensure only “DRC conflict-free” materials are used.