

Asia Tungsten Products Co. Limited (ATC) Supply Chain Policy Statement

Asia Tungsten Products Co Limited is one of the leading global manufacturers of Ferrotungsten alloys and we are committed to ensuring that our raw materials are sourced responsibly for our Ferrotungsten Facility in Vinh Bao, Vietnam. ATC supports the goal of ending violence, human rights violations and preserving the environment globally, including the Democratic Republic of Congo (“DRC”) and Covered Countries, and all conflict-affected and high-risk areas (“CAHRAs”).

ATC condemns all activities in the raw material sector connected to illegal or unlawful exploitation of ores that directly or indirectly finances or benefits armed groups in conflict areas.

Our Ferrotungsten facility has been recognised by the Responsible Minerals Initiative (“RMI”) as conformant to the Responsible Assurance Process (“RMAP-conformant”)

ATC supports the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 which aims to prevent the use of “Conflict Minerals” that directly or indirectly finance, or benefit armed groups in The Democratic Republic of the Congo (DRC) or adjoining countries (as defined in the Act). We are committed to supporting our customers with their diligence and disclosure requirements under the same Section.

ATC supports and push our suppliers to support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI).

As part of this commitment ATC has implemented an on-going policy of only purchasing raw materials that meet the requirements of the OECD Guidance (“OECD Due Diligence Guidance for the Supply Chains of Minerals from Conflict-Affected and High-Risk Areas” 3rd Edition) and Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

ATC uses the recommendations in the OECD Guidance as the model for our own due-diligence to address risks outlined in Annex II of the guidance, namely :

- Serious abuses associated with the extraction, transport, or trade of minerals.
- Any forms of torture, cruel, inhuman, and degrading treatment of humans, including:
 - Any forms of forced or compulsory labour.
 - The worst forms of child labour.
 - Other gross human rights violations and abuses such as widespread sexual violence.
 - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Direct or indirect support to non-state armed groups.

- Direct or indirect support to public or private security forces.
- Bribery, fraudulent misrepresentation of the origin of minerals and money laundering.

ATC'S COMMITMENT:

1. To support the aims and objectives of the U.S. legislation and other guidelines produced by international organisations on the supply of "conflict minerals".
2. To not procure specified metals that originate from facilities in the "Conflict Region" that are not proven as "conflict free" or in relation to which a relevant checklist has not been completed and certified by the supplier.
3. To ask our suppliers to undertake reasonable due diligence within their supply chains in order to ensure that specified metals are being sourced only from:
 - Mines and smelters outside the "Conflict Region" **or**
 - Mines and smelters which have been deemed as "conflict free" if sourced within the "Conflict Region" as evidenced by all supporting traceability documentation as outlined in the OECD guidelines.
4. To develop and continually improve a system of controls and review over our tungsten concentrate supply chain that includes the establishment of strong company management system, identification of risks in the supply chain, and the timely response to identified risk.



Chen Guangyu

General Director

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TỔNG GIÁM ĐỐC
CHEN GUANG YU