



Bill S-211 Compliance Report
April 2024

**Authored By: David DeMars – Supply Chain
Manager – H.C. Starck Canada Inc**

Contents of this report

- 1) Rationale
- 2) Structure, Activities and Supply Chains
- 3) Policies and Due Diligence Processes
- 4) Supply Chain Mapping/Risk Identification
- 5) Remediation Measures
- 6) Remediation of Loss of Income
- 7) Training
- 8) Assessing Effectiveness
- 9) Attachments Summary

1) Rationale

Effective January 1, 2024, entities must, on or before May 31 of each year, submit a report to the Minister of Public Safety on:

- The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity
- Its structure, activities and supply chains
- Its policies and due diligence processes in relation to forced labor and child labor
- The parts of its business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk
- Any measures taken to remediate any forced labor or child labor
- Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains
- The training provided to employees on forced labor and child labor
- How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains

2) Structure, Activities and Supply Chains

This report is applicable to H.C. Starck Canada Inc's operations in Canada for the financial reporting year Jan 1, 2023 to Dec 31, 2023. H.C. Starck's Inc. is a legal corporation located at 933 Vidal St. South, Sarnia Ontario, Canada, operating under Canadian Revenue Agency tax roll #854947520.

H.C. Starck Canada is a wholly owned subsidiary of Masan High Tech Materials, located in Vietnam. Currently there are production facilities in Germany, Vietnam and China. H.C. Starck Canada's reporting structure is such that Sarnia site employee's report to Ryan Bender who serves as Site Manager and is a member of the board of directors of H.C. Starck Canada Ltd. Ryan Bender reports to the CEO in Germany who then reports to the CEO of Masan High Tech in Vietnam.

H.C. Starck Canada currently produces material under NAICS code 325189 for basic chemical manufacturing, producing tungsten metal powder, tungsten carbide and cast tungsten carbide. Current H.C. Starck Canada has approximately 50

employees which comprises both hourly and salary workers. All employees of H.C. Starck Canada are physically located in the province of Ontario, Canada.

H.C. Starck Canada produces material in Canada using raw material imported from the USA, EU & Vietnam. This raw material is current imported into Canada using HS code: 8101.94.00

We export our products globally with primary exports to USA, Japan and the EU in quantity of 800-1200 tons per year. Our products being exported are classified under one of the following HS codes:

- a. Tungsten Carbide – 2849.90.30
- b. Tungsten Carbide Doped – 3824.30.00
- c. Tungsten Metal Powder – 8101.10.00

3) Policies and Due Diligence Processes

H.C. Starck Canada currently has a due diligence process in place to identify and mitigate the risk of adverse/unfair labor practices in our supply chain. This is an alignment with our companies broader Responsible Business Conduct (RBC) strategy and is part of our Environment, Social & Governance (ESG) initiatives. This process is revisited on an annual basis and serves as the basis for our supplier risk evaluation.

Appendices Listed For Reference – attached hereto					
Number	Description	Attachment Name	Revision	Dated	Notes
1	Corporate Code of Conduct	Code of Conduct Version NAFTA	-	26-Jul-21	
2	Corporate Compliance Policy	Compliance Version HCS SAR	-	26-Apr-21	
3	Corporate Commitment to responsibility and sustainability	Corporate Policy Version HCS SAR		26-Apr-21	
4	Supplier Code of Conduct	Supplier Code of Conduct_en	1	11/1/2023	
5	Supplier AuditSelf-Audit Questionnaire	Supplier AuditSelf-Audit Questionnaire (1)	-	-	
6	Source List for Conflict Affected & High Risk Area's	Resources for CAHRAs and due diligence analysis	7.1	19-May-23	Doc # DE-PROC-LIS-004

4) Supply Chain Mapping/Risk Identification

Please see completed Supply Chain Mapping/Risk Identification Summary, attached hereto as

Appendices Listed For Reference – attached hereto					
Number	Description	Attachment Name	Revision	Dated	Notes
7	Supply Chain Mapping/Risk Identification	Risk Assessment - Sarnia - 2023	-	11-Apr-23	

This analysis is structured in following format

- a. Own Business Area Risk Analysis
- b. Direct Suppliers Summary – raw material & additive inputs
- c. Direct Suppliers Detailed Risk Analysis
- d. Indirect Suppliers Detailed Risk Analysis
- e. Indirect Suppliers Action Plan

5) Remediation Measures & Loss of Income

Through effective risk identification using supply chain risk mapping. There were no current direct or indirect suppliers who are currently non-compliant with the requirements of Bill S-211. One supplier was identified for further examination and was found to comply. This supplier was identified through the supply chain risk exercise as their product is produced in China and trans-shipped via Germany. Documentation and training records were submitted by the supplier, reviewed by H.C. Starck and found to comply. Excerpt from risk mapping below...

Indirect Supplier - Risk Analysis 2023 Action Plans						
<i>For each supplier with combined score <10</i>						
Type	Supplier	Supplier #	Location	Country Risk	Impact/Severity	Risk Score
				<i>1-5 (1 low, 5 high)</i>	<i>1-5 (1 low, 5 high)</i>	<i>>20 = action plan needed</i>
Graphite Parts	Henschke GmbH	54270	EU	4	5	20
Summary: Henschke poses a significant risk as parts made in China, sent to Germany and then shipped to Canada. Henschke doesn't have control over the day-to-day operations of the China facility.						
Actions: Audit process/procedure & training records for China factory to ensure process & procedure is up to current labour standards, all employees are trained on these procedures and periodic audits are conducted to ensure compliance.						
Results: Documentation submitted and reviewed in detail which showed Henschke & their Chinese contract manufacturer to be in compliance with generally accepted labour standard & practises.						
Recommendations: Corporate/Group on site audit on Chinese contract manufacturer in future						

As all suppliers are currently compliant with the requirements in Bill S-211 there is no additional remediation action at this time and there is no expected loss of income from continued compliance to this legislation.

6) Training

H.C. Starck Canada has a robust training program for all employees which is software based using a solution provided by Traccess CI. This system allows management of standard training as well as job specific requirements, providing proactive reports to ensure continued training compliance.

All Employees of H.C. Starck Canada are trained on the following topics, separated into Corporate and Site/Country specific trainings. Currently trainings are mandatory for all employees. Re-training is based on a 5 year cycle.

H.C. Starck Group Level Training

- 1) H.C. Starck Code of Conduct
- 2) Masan High Tech Code of Conduct
- 3) Health, Safety Environment & Quality Corporate Principles
- 4) H.C. Starck Corporate Principles

H.C. Starck Canada – Sarnia Site

- 5) Health, Safety Environment & Quality Policy
- 6) Supply Chain Sustainability – UN SDG's, Responsible Sourcing, Fair Labor Practices, Circular Economy, Carbon Footprint Scopes 1-3

7) Assessing Effectiveness

As outlined in this report, H.C. Starck Canada feels the policies & procedures currently in place combined with effective training and periodic risk reviews ensures we are compliant with the requirements set out in Bill S-211. No further actions in addition to this report are required.

8) Attachments Summary

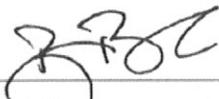
Appendices Listed For Reference – attached hereto					
Number	Description	Attachment Name	Revision	Dated	Notes
1	Corporate Code of Conduct	Code of Conduct Version NAFTA	-	26-Jul-21	
2	Corporate Compliance Policy	Compliance Version HCS SAR	-	26-Apr-21	
3	Corporate Commitment to responsibility and sustainability	Corporate Policy Version HCS SAR		26-Apr-21	
4	Supplier Code of Conduct	Supplier Code of Conduct_en	1	11/1/2023	
5	Supplier AuditSelf-Audit Questionnaire	Supplier AuditSelf-Audit Questionnaire (1)	-	-	
6	Source List for Conflict Affected & High Risk Area's	Resources for CAHRAs and due diligence analysis	7.1	19-May-23	
7	Supply Chain Mapping/Risk Identification	Risk Assessment - Sarnia - 2023	-	13-May-24	

This is the original report without modifications. This report is not submitted jointly with any other legal entity. Currently H.C. Starck Canada Inc does not have reporting obligations in other legal jurisdictions. This report, in it's entirety will be posted on our corporate website for public access.

Website Address: www.hcstarck.com

I hereby attest that, to the best of my knowledge and belief, all information in the above referenced data reported is accurate and complete.

Signature: _____


Date: May 27, 2024

Ryan Bender

Site Manager – H.C. Starck Canada Inc

Managing Director – H.C. Starck Canada Inc

1



Code of conduct - the basis for our success

As a global company, Masan High Tech materials (MHT) bears a high level of responsibility to all its stakeholders including customers, employees, investors and the communities in which it conducts business.

Our Code of Conduct is guided by the internationally recognized principles for the protection of human and labor rights as expressed in the United Nations Universal Declaration of Human Rights, the ILO Core Labor Standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our company respects applicable law, whether local, regional or national, everywhere in the world, and expects its employees and business partners to understand and accept the Code.

The employee agrees to take all reasonable and necessary steps to comply with the Code, the law, as well as Company policies and procedures. Employees should exercise good judgment and avoid even the appearance of improper conduct.

This document briefly summarises the key principles. For detailed information, please refer to the "Explanations on the Code of Conduct". If you are in doubt as to whether a course of action is appropriate, get advice from your Line Manager / Supervisor, the Human Resources Manager or one of the Executive Management Team.

Craig Bradshaw
Chief Executive Officer -
MHT

Dr. Hady Seyeda
Deputy Chief Executive
Officer – MHT
Chief Executive Officer
HCS

Ryan Bender
Director - HCS Canada

1



1 – Fair Competition

MHT is committed without reservation to fair competition and to fair contracting practices with its business partners. Any forms of collusion, or coordination that result in the unfair advantage for one party are prohibited among competitors, as is the abuse of a dominant market position.

2 – Business and financial records

Documents, including those in electronic form, are the property of MHT and are kept secure. Personal data is treated with the utmost care and in strict confidence. MHT's financial reports are prepared in accordance with the relevant legal requirements and internationally accepted accounting practices and principles. All necessary measures to prevent money laundering are taken within MHT's sphere of influence.

3 - Compliance with International Commercial Law and Provisions on Exports

MHT complies with all international agreements, conventions and treaties, as well as national laws controlling trade and financial transactions, and consistently monitors compliance with international and national export control laws.

4 - Company assets

All employees are similarly responsible for the protection of MHT's material and immaterial assets. Particular importance is attached to the results of scientific research and technical developments, such as inventions, patents and other know-how. It is prohibited to disclose company and business secrets to third parties in any form. Third party confidential information that is within MHT's responsibility must also be protected with the same care.

5 - Conflicts of interest

MHT has a zero tolerance policy for bribery and corruption. MHT does not enter into business relationships whose existence or desired scope is dependent on the payment of bribes. At MHT, preventing corruption also means obtaining information about business partners in advance. Business decisions on behalf of MHT may not be influenced by the acceptance of advantages or the granting of benefits and privileges ("perks").

6 - Behaviour toward Government Agencies; Cooperation

The Company is committed to complying with all laws and legislation regulating its businesses. Therefore MHT is dealing with all relevant government agencies cooperatively and with an open approach. If an employee learns that a government agency, legislative body, or other authorized institution, is conducting an investigation of MHT, the legal department must be informed immediately.

7 - Environmental Protection and Safety

MHT and its employees bear responsibility for protecting people and the environment in accordance with all legal and regulatory requirements in the relevant jurisdiction, as well as international industry practice. The Health & Safety, Environment, and Quality policies are the primary guide for all employees on these matters. Safety is the top priority in all dealings involving products that pollute the environment. Additionally each and every employee shares in the responsibility for ensuring the occupational safety in his or her area.

1



8 – Labour and employment

MHT does not tolerate discrimination or harassment, abuse or corporal punishment in any form, whether by business partners, candidates or applicants, or employees. Furthermore, MHT has a zero-tolerance policy towards any form of forced labour, modern slavery or the most severe form of child labour.

9 – Behaviour towards Suppliers of Raw Materials

MHT is working together with partners whose stance on ethical, social and environmental policy matters is consistent with that of MHT. For this reason, all suppliers of raw materials have to prove that all applicable guidelines laws and regulations, like the OECD Due Diligence and EU regulation for conflict raw materials are complied with and that they are in possession of all of the necessary permits, authorizations and approvals. Furthermore, all parties involved in our supply chain commit to comply with our purchasing guidelines.

10 – Ensuring Compliance

MHT does not tolerate any legal violations whatsoever and consistently complies with the guidelines and rules described. Therefore compliance with this Code of Conduct, the law and Company's policies is subject to regular reviews, executed on behalf of the executive management by the supervisors.

11 – External Relations

MHT has a policy on how to deal with external stakeholders and who is authorised to communicate with them. Therefore, in all matters concerning the company, employees who do not have authorization must avoid giving the impression that they speak on behalf of the company.

12 – The Compliance Organisation and Contact Persons

Your Line Manager / Supervisor is the first point of contact for any questions you may have regarding the Code of Conduct.

If the matter concerns your supervisor him or herself, you can contact the HR department or your next higher supervisor.

The Executive Management Team performs the corporate compliance function in the MHT Group. A member of the Team is your contact person for any questions you may have regarding the Code of Conduct. Inquiries can also be made anonymously, and all reasonable efforts are made to maintain confidentiality, although MHT is, of course, obligated to initiate investigations and to comply with the law and support law enforcement.

If you have specific legal questions, particularly regarding whether certain actions are lawful, please contact the appropriate Legal Department.

MHT guarantees that no employee will be subject to discrimination, retaliation or any other adverse treatment based on the employee having made a report in good faith.

2

COMPLIANCE POLICY

There goes a saying "Vision without action is merely a dream. Action without vision just passes the time. Vision with action can change the world". At Masan High-Tech Materials (MHT), our vision is to be the leading integrated supplier of high-tech advanced materials critical to global innovation. This can only happen if we operate in our business environment in a legally secure manner. Therefore we set up practical processes and policies that will help us to make our vision real.

However, we can only become the leading integrated supplier if our stakeholders and shareholders trust us. We have to earn this trust - starting with management and extending to our employees. This requires compliance.

One of the official translations of compliance is "conduct in accordance with applicable law". At MHT we take this to mean that we comply with laws and other external requirements, as well as binding commitments that we have entered voluntarily.

This applies without exception. Illegal business and activities are therefore unacceptable to us at MHT - anywhere in the world. Compliance and integrity protect our license to operate worldwide and that's why we place a high value on responsible corporate governance. We act responsibly towards our employees, customers, suppliers, business partners, authorities and society in general.

This Compliance Policy is the basis for our actions. As requirements may differ in some cases in the various countries in which we operate, this policy is supplemented by local guidelines. One thing is particularly important to us: It is by no means just about formal compliance with legal requirements and rules. Or about avoiding possible penalties. Rather, our concern is that each and every one of us actually believes in the rules. Let's work together to successfully develop new solutions that our stakeholders and shareholders trust.

Because that's what matters.



Craig Bradshaw
Chief Executive Officer - MHT



Dr. Hady Seyeda
Deputy Chief Executive Officer - MHT



Ryan Bender
Director - HCS Canada

Chief Executive Officer
HCS

3

COMPLIANCE POLICY

To be legally compliant...

- we maintain a compliance organization with the necessary resources. This also includes a system for whistleblowers in accordance with locally applicable legal requirements.
- we communicate openly, inform and train our employees, and actively involve them in maintaining legal security.
- we act in accordance with our Code of Conduct (CoC). This guideline explains the correct behavior on important issues such as competition, corruption, bribery, discrimination, financial compliance, behavior towards authorities, etc.
- we regularly identify the risks and opportunities arising in the course of our activities and derive appropriate targets and measures from the results.
- we take the needs and expectations of our external and internal stakeholders into account.
- we comply with laws and other external requirements, but also with binding commitments and standards that we have entered into voluntarily. We have systems in place to check this in order to be able to take appropriate measures to comply with the requirements.
- we purchase our raw materials with the necessary due diligence in accordance with OECD and EU requirements. Respect for human rights and the environment is already a matter of course for us today. We do not tolerate the worst forms of child labor, discrimination, modern slavery or other human rights abuses.
- we support our customers in the safe handling of our products.
- we handle our data and the data of our business partners and employees responsibly and in accordance with local legal requirements.
- we cooperate openly and trustfully with the authorities. We show zero tolerance for violations of the law.

3



Commitment to responsibility and sustainability **- four principles of our success**

The Masan High-Tech Materials Group produces high-performance powders mainly of the refractory metal tungsten and its compounds from ore - sourced in our mine in Vietnam - recycled materials and tungsten chemicals, but also of copper, cobalt, fluorspar and bismuth and other by-products according to customer specifications. Customers benefit from the highest and most consistent quality and a comprehensive product portfolio.

We are convinced that our sustainable success is based on a multitude of different factors: Starting with the qualification of our employees, through active health and safety management, economic and ecological efficiency, energy efficiency, product and process quality, to the consideration of ethical and social aspects including the care and support for the community. These can be summarized in four principles.

As part of our integrated management system, we are therefore committed to the continual improvement of our products and manufacturing processes in terms of quality, energy-related and environmental performance, safety and health of our employees, customers and the public, and compliance with all binding legal and self-imposed requirements. The leadership and resources required for this are provided by the company accordingly.

Craig Bradshaw
Chief Executive Officer -
MHT

Dr. Hady Seyeda
Deputy Chief
Executive Officer -
MHT
Chief Executive
Officer HCS

Ryan Bender
Director - HCS Canada

3



Principle 1 - Occupational health and safety

We provide a safe working environment for all our employees and workers so that they will return home safe and healthy every day. In order to maintain this standard continually, we rely on consistent, transparent communication of information and specific training as well as active involvement of our employees.

We will only perform work that can be done safely. We know that all injuries, incidents, and work illnesses are preventable. On the basis that we are collectively and individually responsible for preventing injuries to ourselves and others. Therefore any kind of safety deficiencies, near misses and accidents at work are analysed in detail and regular risk assessments are carried out in order to eliminate sources of danger early and sustainably. Occupational safety and health protection are important criteria even at the design and procurement stage of new processes and technologies.

Principle 2 - Quality awareness

We commit and develop our employees to quality and cost-conscious action. This enables us to assure our customers the expected or specified quality by using our experience and competence. Since quality is created at the source, we select our suppliers of raw materials, products and services in a targeted manner and develop them further in the sense of a long-term partnership. We continually develop the quality of our processes and products according to the Plan-Do-Check-Act (PDCA) cycle.

Principle 3 - Environmental protection and energy use

By using appropriate technical and economic processes in development, production and all other accompanying activities, we ensure that the environment and the resources available to us are treated with care, during mining, in all production processes along the entire value chain, and during site/mine closure.

Beside mining, the conflict-free sourcing of raw materials, the recycling of our products (closed loop) as well as of other tungsten-containing scrap are priorities for us. Furthermore we are committed to a continuous improvement of our management systems in order to improve both our environmental and energy performance, and for the prevention of environmental pollution and waste caused by our operation activities.

We also pay attention to energy efficiency from the procurement process. In this way we can offer our customers environmentally friendly products.

To ensure that all employees and contractors will thoroughly acknowledge their responsibility in environmental protection we provide the necessary information, training and guidelines.

Principle 4 - Communication

Communication is the foundation for success and for a trusting cooperation. That is why we promote employee satisfaction through an open culture of discussion and are committed to the consultation and participation of our employees. We inform our stakeholders openly and transparently. We communicate our corporate policy on request. We inform the relevant parties about the goals derived from this and all binding obligations.

Supplier Code of conduct – the basis for our joint success

As a global company, H.C. Starck Tungsten Powders (HCS), a member of the Masan High Tech Materials Group, has a high level of responsibility towards all its stakeholders, including business partners, employees, investors and the regions in which the company operates.

Our Code of Conduct is guided by the internationally recognized principles for the protection of human and labor rights as expressed in the United Nations Universal Declaration of Human Rights, the ILO Core Labor Standards, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Our company respects applicable law, whether local, regional or national, throughout the world, and expects not only its employees but also business partners to understand and accept the Code.

Therefore, as our business partner, you agree to take all reasonable and necessary steps to ensure that you and your own suppliers comply with this Code. If you have a policy of your own that is similar in content, we will be happy to accept it after a positive review.

4

1 – Fair Competition

HCS and its business partners are unconditionally committed to fair competition and fair contractual practices. Any forms of agreements or arrangements that result in an unfair advantage for one party are prohibited among competitors, as is the abuse of a dominant market position.

2 – Business and financial records

Mutually provided documents, including those in electronic form, are the property of the respective business partner and are stored securely. Personal data shall be treated with the utmost care and in strict confidence. Within the sphere of influence of the respective business partners, all necessary measures are taken to prevent money laundering.

3 - Compliance with International Commercial Law and Provisions on Exports

Business partners adhere to all international agreements, conventions and treaties, as well as national laws controlling trade and financial transactions, and consistently monitor compliance with international and national export control laws.

4 - Intellectual property rights

The intellectual property rights of others are respected without exception. All employees are obliged to treat company and business secrets confidentially and not to pass them on to third parties in any form. Confidential information that HCS discloses to business partners must also be protected with the same care.

5 - Bribery and corruption

HCS pursues a zero-tolerance policy towards bribery and corruption. We do not enter into business relationships whose existence or desired scope is dependent on the payment of bribes. For HCS, avoiding corruption also means obtaining information about business partners in advance.

6 - Behaviour toward Government Agencies; Cooperation

Our company is committed to comply with all laws and regulations that govern its business. Therefore, HCS deals with all relevant investigative and governmental authorities in a respectful, cooperative and open manner.

7 - Environmental Protection and Safety

HCS and its business partners have a responsibility to protect people and the environment in accordance with all legal and regulatory requirements in their respective jurisdictions, as well as international industry practice. Appropriate health and safety, environmental and quality guidelines are required of our business partners.

8 – Labour and employment

HCS does not tolerate any form of discrimination or harassment, abuse or corporal punishment, whether in its own company or by business partners. Furthermore, HCS has a zero-tolerance policy towards any form of forced labor, modern slavery or child labor in accordance with the criteria of the ILO in its own company, with business partners and their supplier.

4

9 – Behaviour towards Suppliers of Raw Materials

HCS works with partners whose stance on ethical, social and environmental issues is consistent with that of HCS. For this reason, all suppliers of raw materials must demonstrate compliance with all applicable policies, laws and regulations, such as OECD Due Diligence, the EU Conflict Raw Materials Regulation and, to the extent required, the Supply Chain Sourcing Obligations Act, and hold all necessary permits, licenses and authorizations. In addition, all parties involved in our supply chain commit to comply with our purchasing guidelines.

10 – Ensuring Compliance

HCS does not tolerate any violations of the law and consistently adheres to the guidelines and rules described. We expect the same from our business partners.

11 – External Relations

HCS has a policy for dealing with external stakeholders and who is authorized to communicate with them. We ask our business partners to provide us with contact persons who are authorized to speak on behalf of their companies in a legally binding manner.

12 – The Compliance Organisation and Contact Persons

Your direct contact person at HCS is the first point of contact for any questions you may have in relation to the Code of Conduct. Alternatively, you can also make confidential reports via the "Your Voice Matters" whistleblower system available on our website. HCS guarantees that no business partner will be subject to adverse treatment because they have made a report in good faith.

(5)

Supplier Audit/Self-Audit Questionnaire



On-Site Audit

Self-Audit

SECTION ONE: GENERAL SUPPLIER INFORMATION

Company Name:	
City, Province / State, Zip Code:	
Principle Product(s) / Services(s):	
Quality Contact:	
Phone Number:	
Email Address:	

Question	Response	Comments
1. Type of Organization	<input type="checkbox"/> Manufacturer <input type="checkbox"/> Distributor <input type="checkbox"/> Service	
2. How long has the company been in business?		
3. Is the company registered with recognized standards such as ISO? a. Please list with expiration date. b. Please provide copy of certificate(s)	<input type="checkbox"/> Yes <input type="checkbox"/> No Certificate(s) Number:	

SECTION TWO: QUALITY SYSTEM

Management Responsibility/Review	Yes	No	N/A
Is the quality management system reviewed at planned intervals? How often are the reviews conducted?			
Who attends the reviews?			
Do the inputs to the review include the following? <ul style="list-style-type: none"> • Results of audits • Customer feedback • Process performance and product conformity • Status of preventive and corrective action • Follow up actions from previous reviews • Changes that could affect the quality management system • Recommendations for improvement 			
Do the outputs of the review include the following? <ul style="list-style-type: none"> • Improvement of the effectiveness of the quality management system and its effectiveness • Improvement of product related to customer requirements • Resource needs 			

5

Supplier Audit/Self-Audit Questionnaire



Comments:

Document Control	Yes	No	N/A
Have documented procedures been established to control all documents, data and applicable external documents, including hard copies and electronic media?			
Are documents and data reviewed and approved for adequacy by authorized personnel prior to issue?			
Are documents reviewed and updated as necessary? Is there a process for periodically reviewing Quality System documents?			
Do records for document/drawing revision include: a description of the changes, affected document identification, approving individual(s) signatures, the approval date, and affectivity date?			
Are obsolete documents promptly removed from all points-of-use, or otherwise prevented from unintended use?			
Are customer specifications controlled? How are changes, revisions, and deviations handled?			

Comments:

Records	Yes	No	N/A
Are documented procedures maintained for all of the following: 1. Identification of records to be retained 2. Indexing and filing of these records 3. Access to records 4. Storage (location and method) 5. Specification of retention time 6. Disposition of records			
Are records stored and retained so they are readily retrievable (within 48 hours)?			
How much data are held electronically? How are the data protected? Password access? Is the system backed up? Is all information that must be protected included in the backup process?	Please explain:		

Comments:

Training	Yes	No	N/A
Are training needs identified to ensure that all personnel are trained to adequately perform their assigned responsibilities?			
Does your organization have employee job descriptions that describe the competencies required for performing the job?			
Is the training that is provided documented and are the training records maintained for a set period of time?			

5

Supplier Audit/Self-Audit Questionnaire



Is the effectiveness of training evaluated?			
Comments:			
Purchasing Controls/Supplier Approval Process	Yes	No	N/A
Are documented procedures established and maintained to ensure purchased product conforms to specified requirements?			
Are there criteria for the selection and monitoring of suppliers?			
How are suppliers controlled? Is there an approved supplier list? Are service providers, such as calibration houses, test labs, and so forth, on the list? When was the list last updated?			
Do you categorize your contractors and suppliers by risk criticality?			
Do you audit your suppliers on a scheduled basis?			
Do you require your suppliers to notify you before any changes to the product or service they provide?			
Do you monitor and measure your critical/major/minor suppliers' performance?			
Comments:			
Contract Review	Yes	No	N/A
Are procedures established and maintained for contract/purchase order review and for the coordination of these activities?			
Is each contract/purchase order reviewed to ensure that stated customer requirements pertaining to quality, process, and materials can be met; and is this review documented?			
Are there documented procedures to ensure that the customer's requirements are met by the manufacturing process?			
Once you review and accept a customer's contract (purchase order), do you send an acknowledgement back to the customer informing them that you have accepted the contract (P.O.)?			
Comments:			
Customer Complaints	Yes	No	N/A
Is a procedure established and maintained for receiving, reviewing, and evaluating customer complaints?			
Are records of complaint evaluations/investigations maintained?			
Are there written procedures for implementing corrective and preventive actions related to customer complaints?			

5

Supplier Audit/Self-Audit Questionnaire



Do you have an established procedure to notify your customer of the results of complaint investigations and any action taken?			
Do you trend customer complaints and returns?			
Are the results of customer complaints reviewed with top management?			

Comments:

Inspection and Testing	Yes	No	N/A
Is a procedure established and maintained for incoming acceptance activities to ensure that specified requirements for in process product are met?			
Is incoming product inspected, tested or otherwise verified as conforming to specified requirements?			
Is acceptance or rejection of incoming product documented?			
Are records of incoming inspections and tests maintained?			
Is a procedure established and maintained for in-process acceptance activities to ensure that specified requirements for in process product are met?			
Is acceptance or rejection of in-process product documented?			
Are records of in-process inspections maintained?			
Is a procedure established for finished product acceptance to ensure that each production run, lot or batch of finished product meets acceptance criteria?			
Is acceptance or rejection of finished product documented?			
Do acceptance records include: acceptance activities performed, dates, results, and signature of those conducting activities?			
Is finished product held in quarantine or otherwise adequately controlled until release?			
Does QA have authority to accept and reject product?			
Comments:			

Process Controls	Yes	No	N/A
Do you have a formal system to translate customer requirements into process specifications and process controls?			
Do you track delivery performance to your customer?			
If you answered yes to the previous question, then what percentage of your orders were delivered late in the last six (6) months?	Please explain:		
Does your organization do Quality Trending of your in-house production, and is this information made available to your employees?			
Do your routers/operation sheets identify specific operations for each component?			
Do your production routers indicate Accept/Reject status?			

5

Supplier Audit/Self-Audit Questionnaire



Comments:

Product Identification and Traceability

Yes	No	N/A
-----	----	-----

Do you have documented procedures that account for traceability of materials/services that are or will be used on our product?			
--	--	--	--

Is a procedure implemented that requires the identification of product during all stages of product realization?			
--	--	--	--

Is a procedure established and maintained for identifying product with a lot or batch number?			
---	--	--	--

Are materials/products clearly identified to indicate their status in terms of whether they are Accepted, Rejected, or on Hold?			
---	--	--	--

Comments:

Handling, Storage, Packaging, Preservation, and Delivery

Yes	No	N/A
-----	----	-----

Is a procedure established and maintained for the handling, storage, packaging, preservation and delivery of product?			
---	--	--	--

Is a procedure established and maintained for control of storage areas and stock rooms for product to prevent mix-ups, damage, deterioration, contamination, or other adverse effects pending use or distribution, and to ensure that no obsolete rejected, or deteriorated product is used or distributed?			
---	--	--	--

Are aged sensitive items identified as such, and are there procedures in place to ensure their use (e.g., First-In, First-Out stock rotation) or recall prior to the expiration date?			
---	--	--	--

Are there written procedures that describe the methods for authorizing receipt from and dispatch to storage areas and stock rooms?			
--	--	--	--

Is a procedure established and maintained for control and distribution of finished product to ensure that only product approved for release are distributed?			
--	--	--	--

Are distribution records maintained which include or refer to the location of: <ol style="list-style-type: none"> 1. The identification and quantity of devices shipped 2. The date shipped 3. The unique control number used 			
--	--	--	--

Do you have procedures for the verification, storage, and maintenance of customer's product for incorporation into products being supplied to us or for related activities (such as additional processing)?			
---	--	--	--

Comments:

Calibration

Yes	No	N/A
-----	----	-----

Is a procedure implemented which requires that inspection, measuring and test equipment is routinely calibrated, inspected, checked, and maintained?			
--	--	--	--

Is the equipment calibrated against recognized standards (i.e. NIST), and is this calibration documented?			
---	--	--	--

Are calibration service providers on the ASL? How are calibration requirements communicated to the service provider?			
--	--	--	--

Do you have a procedure to notify the customer if it is found that any inspection equipment used during production of a customer's product was found to be out of calibration?			
--	--	--	--

5

Supplier Audit/Self-Audit Questionnaire



Comments:

Preventive Maintenance	Yes	No	N/A
Is a schedule for the adjustment, cleaning, and other maintenance of equipment established and maintained to ensure that manufacturing specifications are met?			
Do you document the maintenance activities including the date and individual(s) performing the maintenance activity, and the date and individual(s) conducting the inspections?			

Comments:

Internal Audits	Yes	No	N/A
Is there a documented system for conducting internal audits?			
Are internal audits carried out in accordance with documented procedures for planning and implementing audits?			
Are internal auditors trained by qualified trainers?			
Do management personnel responsible for the area take timely containment and/or corrective/preventive action on deficiencies found during the audit?			
Are the results of internal quality audits reviewed with top management?			

Comments:

Corrective and Preventive Action (CAPA)	Yes	No	N/A
Do you have established procedures for implementing corrective and preventive action?			
Does this procedure take into account root cause investigation, containment, action implementation and effectiveness verification?			
Are the results of corrective/preventive actions reviewed with top management?			

Comments:

5

Supplier Audit/Self-Audit Questionnaire



SECTION THREE- Health and Safety and Environmental

Health and Safety and Environmental	Yes	No	N/A
Is there a written health and safety policy, and is the policy posted			
Is there a written environmental policy, and is the policy posted			
There are sufficient qualified and competent people to implement the organization's health and safety and environmental management system.			
There are documented procedures, agreed to by employees, for employee involvement and consultation on health and safety matters, including a procedure for dealing with health and safety issues, and resolving disputes if they arise			
Regular, timely reports on health and safety performance are produced and distributed within the organization.			
Reports of audits and reviews of the health and safety management system are produced and distributed within the organization			
Comments:			

Supplier Audit/Self-Audit Completed by:

Name (Printed)	Signature	Title	Date
----------------	-----------	-------	------

Please return signed form to:

ken.muir@hccstarck.com

SECTION FOUR: Completed by HC Starck Quality and Purchasing Personnel

Supplier Audit/Self-Audit Results:

- Acceptable
- Further Action Required

Action:

5

Supplier Audit/Self-Audit Questionnaire



Supplier Audit/Self-Audit Review/Approval Completed by:

Name (Printed)	Signature	Title	Date

6

Sources for CAHRAs and due diligence analysis

Beside official EU CAHRAs list and the Democratic Republic of the Congo (DRC) and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia

Conflict Affected and High-Risk Areas (CAHRAs)

The RMI encourages responsible sourcing from conflict affected and high risk areas (CAHRAs). The RMI does not provide lists of countries that may be conflict-free or conflict-affected. The nature of conflict is ever-changing, while some conflicts may be country-wide, many conflict-related and high-risk incidents are concentrated on a regional or local level, or involve individual sites, entities, and actors. Once companies identify which conflict-affected and high-risk areas they are sourcing from, both country-level risk assessments and individual supplier due diligence are critical to ensure responsible sourcing of minerals from CAHRAs. In alignment with the [OECD Due Diligence Guidance](#), the RMI provides tools and resources to enable companies to conduct individual and collective due diligence within supply chains to source minerals responsibly.

Definitions

OECD definition of conflict-affected and high-risk areas: Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.

EU definition of conflict-affected and high-risk areas: Areas in a state of armed conflict, fragile post-conflict areas, as well as areas witnessing weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.

According to the RMI RMAP Standard, the CAHRAs shall include, at a minimum, countries identified as high-risk by relevant conflict minerals regulation, such as: The Democratic Republic of the Congo (DRC) and its nine adjoining countries as outlined in Section 1502 of the Dodd Frank Act, namely Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia; and, the indicative and non-exhaustive list of

6

CAHRAs provided by the European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821.

On December 17, 2020 pursuant to Article 14.2 of the European Union Conflict Minerals Regulation 2017/821 the European Commission Directorate General for Trade (DG TRADE) published the indicative, non-exhaustive and regularly updated [list of conflict-affected and high-risk areas \(CAHRAs\)](#).

Key Resources

- <https://www.mvorisicochecker.nl/en> CSR Risk Check, provided by the Dutch and German Government
- [EU CAHRAs List](#) - the indicative, non-exhaustive and regularly updated list of conflict-affected and high-risk areas (CAHRAs).
- [The European Commission non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks](#) under Regulation (EU) 2017/821.
- [RMI's Country Risk Assessment Tool](#) available to RMI member companies and auditees.

6

EU CAHRA Guidance: List of open information sources

Note: Thresholds are only mandatory for the CAHRA analysis, but they can also be used as a guide for the DD analysis.

Criterion	Coverage	Open sources	Threshold (risk according to traffic light system)	
			„yellow“	„red“
CONFLICT	Global	Analytical sources:	-	-
		Heidelberg Conflict Barometer	4	5
		Geneva Academy Rule of Law in Armed Conflicts	-	Involved in armed conflict in corresponding area
		Assessment Capacities Project — Global Emergency Overview	2.1 - 3	> 3
		Maps Tables:	-	-
		Uppsala Conflict Data Program — Georeferenced Event Dataset	Number of death 2-10 (last reporting period; development over time)	Number of death >10 (last reporting period)
		CrisisWatch	-	Military activities reported in corresponding area
		CrisisInSight ACAPS	-	Military activities reported in corresponding area, Report about crisis in connection with tungsten
		Global Peace Index	orange on map	red on map
		Major Episodes of Political Violence	Moderate (8-11)	Serious (12-15) – Extreme (20-25)
	Regional	Armed Conflict Location and Event Data	475-1724 events/year	>1724 events/year
		International Peace Information Service — Conflict Mapping	Countries shown are CAHRA due to Dodd Frank Act	
		International Tin Association	Check monthly reports send by iTSCi	
		Mining Conflicts in Latin America	Medium (for tungsten)	High (for tungsten)

6

GOVERNANCE	Global	Worldwide Governance Indicators	One criterium <15% /	min. three criteria <15% or one criterium <10%
		Fragile States Index	FSI 60,0-89,9	FSI >89,9
		Corruption Perception Index	Score 39-20	Score <20
		National Resource Governance Institute	Composite Score 44-30	Composite Score <30
HUMAN RIGHTS	Global	United Nations Security Council Resolutions (UNSC)	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		United Nations Human Rights Council	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Office of the United Nations High Commissioner for Human Rights	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		United Nations Development Program — International Human Development Indicators — Country Profiles	Human Development Index 0,699-0,450	Human Development Index <0,450
		Amnesty International	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Global Witness	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Human Rights Watch	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten
		Mines and Communities	Report about breach of human rights (free speech, political lawsuits)	Report about armed conflicts, child labour in connection with tungsten

6

Forced Labour and Child Labour	Global	Bureau of International Labor Affairs https://www.dol.gov/agencies/ilab	Forced or child labour in connection with the mining of W
--------------------------------	--------	---	---

Source: Commission Recommendation (EU) 2018/1149 of 10 August 2018 on non-binding guidelines for the identification of conflict-affected and high-risk areas and other supply chain risks under Regulation (EU) 2017/821 of the European Parliament and of the Council, <https://eur-lex.europa.eu/eli/reco/2018/1149/oj>.

Additional Resources

OECD and EU Guidance

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

The OECD Due Diligence Guidance provides detailed recommendations to help companies respect human rights and avoid contributing to conflict through their mineral purchasing decisions and practices. This Guidance is for use by any company potentially sourcing minerals or metals from conflict-affected and high-risk areas.

Raw material Resources

[Deutsche Rohstoffagentur – Bundesanstalt für Geowissenschaften und Rohstoffe](#)

Webpage of the German Government

<https://roskill.com/>

Webpage of Wood Mackenzie

<https://www.bgs.ac.uk/>

British Geological Survey

[US Geological Survey](#)

US data on Resources

Sanctions Lists - to identify sanctioned companies / individuals

[US OFAC Sanctions](#)

United States Department of Treasury Office of Foreign Assets Control administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of

6

weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States.

[UN Sanctions](#)

Consolidated United Nations Security Council Sanctions List.

[EU Sanctions](#)

Comprehensive list of sanctions imposed by the European Union.

Country Rankings, Maps and Indices - to assist with Risk Assessment

[Global Peace Index](#)

The world's leading measure of national peacefulness, the GPI measures peace according to 23 qualitative and quantitative indicators

[Heidelberg Conflict Barometer](#)

The Conflict Barometer published annually since 1992 analyses the global conflict events. It includes non-violent and violent crises, wars, coup d'etats as well as peace negotiations.

[Control Risk Worldmap](#)

Mapping security and political risks

[CrisisInSight | ACAPS](#)

Mapping detailed individual crisis in the world and the severity index as indicators thereof for lots of different categories, each one judged by an index from 1 (very low) to 5 (very high). The categories are Geographical, Human, People in need, Concentration of conditions, Society and safety and Operating environment. The donators and partners are trustworthy and serious.

[INFORM worldmap](#)

Humanitarian crisis map (not limited to conflict or security issues)

[Know Your Country](#)

Country by country reports of money laundering and sanction information

[UNDP International Human Development Indicators – Country Profiles](#)

Interactive tool for human development data from around the world. Data presented was used in preparation of the 2016 UNDP Human Development Report. The Human Development Report Office releases five indices each year: the Human Development Index (HDI), the Inequality-Adjusted Human Development Index (IHDI), the Gender Development Index (GDI), the Gender Inequality Index (GII), and the Multidimensional Poverty Index (MPI).

6

State Department Human Rights Report

US Department of State country reports on Human Rights

Transparency International (TI)

TI Country Corruption Reports

U.S. Dept. of Labor Report

2018 List of Goods Produced by Child Labor or Forced Labor

World Bank

The World Bank's Worldwide Governance Indicators

World Bank Doing Business Report

The indicators are used to analyze economic outcomes and identify what reforms of business regulation have worked, where and why.

World Justice Project (WJP)

WJP Rule of Law Index, the world's leading source for original, independent data on the rule of law.

The Office of the United Nations High Commissioner for Human Rights (OHCHR)

OHCHR has country pages linking to more specific sub-reports for human rights related topics:

- Example: [OHCHR report for DRC](#)

Resources in other languages and/or region-specific

- China's Overseas Security Risks Blue Book (2018) by National Security Research Department of Renmin University, China Overseas Security Research Institute and China National Petroleum Corporation. This publication focuses on the geopolitical elements. The publication is available in book stores/e-commerce platforms in China. The Paper's press release (in Chinese) on the book's publication is available at http://www.cssn.cn/zx/bwyc/201802/t20180202_3838395.shtml.
- The 2018 Country-risk Rating of Overseas Investment from China report by the Chinese Academy of Social Sciences (CASS). The report is updated annually and its broad range of indicators include e.g. internal conflict, external conflict, government stability, military intervention in politic, etc. The report is

6

Resources for CAHRAs and due diligence analysis | DE-PROC-LIS-004



available
at http://en.iwep.org.cn/papers/papers_papers/201801/W020180130339272647312.pdf.

- CASS and China Bond Rating Co., Ltd. work together and published the Blue Book of Outbound Investment and Risks, which includes dedicated sessions on armed conflict, geopolitical context and political stability. The link to the summary of its key findings (in Chinese) is available at <https://www.ssap.com.cn/c/2017-04-12/1053144.shtml>.

Risk Assessment Tools

Risk Readiness Assessment (RRA)

Risk Assessment in Raw Materials Supply Chains assessing social and environmental risks in raw material extraction and processing, and industry's ability to appropriately manage such risks, remains a challenge for downstream companies due to the size and complexity of international supply chains.

RJC Risk Assessment Toolkit

Responsible Sourcing Council Risk Assessment tool for actors across the supply chain.

LBMA Supply Chain Risk Assessment Form

Developed for Good Delivery Refiners to assess Risk level of the business relationship based on supply chain information and sourcing practices evaluation.

6

Resources for CAHRAs and due diligence analysis

DE-PROC-LIS-004



Databases and Risk Data Sources

Verisk Maplecroft

Global risk indices, analytics and risk management solutions. Country risk monitoring, customizable risk calculators, dashboards and solutions for assessing and mitigating risk from market entry to project development, operation and closure.

Thomson Reuters World-Check Risk Intelligence

Risk intelligence that serves the Know Your Customer (KYC) and third party risk management of highly regulated industries. For organizations concerned with business relationship risk and financial crime compliance, World-Check helps powers a variety of identity verification, AML/CFT/PEP screening and KYC due diligence processes.

Bureau Van DIJK

Compliance - anti-corruption and third-party due diligence, sanctions resources. Extensive company data, corporate structures and adverse data that delivers fast insight on your customers and business partners, and the individuals behind them for governance, risk management and compliance.

Oeko-Institute

Europe's leading independent research and consultancy organization working for a sustainable future. Provides information on environmental and legal compliance through reports and publicly available research.

ELL Due Diligence Hub

Tools for risk assessment, mitigation, remediation, and reporting.

Other potential Risk Data Sources:

- BSI
- Claigan
- Control Risks
- Crisis Group
- The Economist Intelligence Unit (EIU)
- Navanti Group
- Palantir
- Verite

Direct Supplier Summary - 2023

Raw Material Inputs	Commodities (Vanadium Carbide, Nickel, Copper Manganese Phosphate, Lithium, Niobium Carbide, Chromium Oxide, Chromium Carbide, MAS 4000/7000, Carbon Black, Lamp Black, Petro Coke)
---------------------	---

Industry-specific risk: 1 Violation of the Basel Convention 2 Disregard for occupational health and safety 3 Child labor 4 fair wages (Source: CSR Check)

Industry-specific risk: - Child labor, forced labor

Resulting measures: No further action required, as the risk of tungsten is low. 1. Most suppliers are under ownership of Masan Group 2 prohibited by law as well as good monitoring 3 minimum wages available in the countries listed below

Resulting measures: - Purchase only through certified Smelters - KYC check

Top 1 Supplier (Sales) Land	1a - Masan Tungsten (50%) Vietnam	2a - HC Starck Gmbh (70.375%) Germany
Top 2 Supplier (Sales) Land	1b - Global Tungsten & Powders (39%) USA	2b - Hogganas (22.23%) Germany & USA
Top 3 Supplier (Sales) Land	1c - HC Starck Gmbh (11%) Germany	2c - Cancarb (4%) Canada
Top 4 Supplier (Sales) Land	N/A	2d - Trebacher (2.5%) Germany & USA
Top 5 Supplier (Sales) Land	N/A	2e - Elementis Chromium (.25%) USA
Observation (%)	100.00%	99.36%

Country-specific risk (incl. source): 1 U.S. and Germany: no risk of child labor or forced labor (Source: International Child Labor & Forced Labor Reports | U.S. Department of Labor (dol.gov) – 2022 List of Goods produced by Child Labor or Forced Labor) 2 Masan in Vietnam has a comprehensive and thorough process to ensure compliance with recognized CSR standards.

Germany / Austria: no risk of child labor or forced labor (Source: International Child Labor & Forced Labor Reports | U.S. Department of Labor (dol.gov) – 2022 List of Goods produced by Child Labor or Forced Labor),

Resulting measures: - n.a

Resulting measures: - n.a

7

Direct Supplier Risk Analysis - 2023

Material 1a- Tungsten Oxide - Vietnam (Masan)	Material 1b - Tungsten Oxide - Germany & Additives (HC Starck GmbH)	Material 1c - Tungsten Oxide - USA (GTP)	Material 2b-- Additives - USA & EU (Hoganas)	Material 2c-- Additives - Canada (CanCarb)	Material 2e- Additives - Germany (Treibacher)	Material 2e- Additives - USA (Elements)
---	---	--	--	--	---	---

Industry-specific risk: 1. Manufacturers of chemical products 2. Human rights: occupational health and safety 3. Environmental protection: Pollution of water (drinking water)

Resulting Measures: Internal customers covered under "Own Business Area" disclosure

Country-specific risk (incl. source): 1. Hanoi / UN Focus on children's and women's rights (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

Industry-specific risk: 1. Manufacturers of chemical products 2. Human rights: occupational health and safety 3. Environmental protection: Pollution of water (drinking water)

Resulting Measures: Internal customer covered under "Own Business Area" disclosure

Country-specific risk (incl. source): 1. USA supplier: low risks (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

Industry-specific risk: 1. Manufacturers of chemical products 2. Human rights: occupational health and safety 3. Environmental protection: Pollution of water (drinking water)

Resulting Measures: Sustainability report (Published as "public due diligence FY 2022"); internal process & procedure as well as local laws limit instances of adverse labour practices.

Country-specific risk (incl. source): 1. USA supplier: low risks (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

Industry-specific risk: 1. Manufacturers of chemical products 2. Human rights: occupational health and safety 3. Environmental protection: Pollution of water (drinking water)

Resulting Measures: Sustainability report (Published as "sustainability agenda 2022"); internal process & procedure as well as local laws limit instances of adverse labour practices.

Country-specific risk (incl. source): 1. EU & USA supplier: low risks (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

Industry-specific risk: 1. EcoVadis Platinum Rating

Resulting Measures: N/A EcoVadis puts Canada in the top 1% of all suppliers

Country-specific risk (incl. source): 1. EcoVadis Platinum Rating 2. Issues with Environmental Rights and Indigenous Peoples (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

Industry-specific risk: 1. Manufacturers of chemical products 2. Human rights: occupational health and safety 3. Environmental protection: Pollution of water (drinking water)

Resulting Measures: Sustainability report (Published as "Treibacher CARE3"); internal process & procedure as well as local laws limit instances of adverse labour practices.

Country-specific risk (incl. source): 1. Germany supplier: low risks (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

Industry-specific risk: 1. Manufacturers of chemical products 2. Human rights: occupational health and safety 3. Environmental protection: Pollution of water (drinking water)

Resulting Measures: Sustainability report (Published as "Unique Chemistry, Sustainable Solutions Report"); internal process & procedure as well as local laws limit instances of adverse labour practices.

Country-specific risk (incl. source): 1. USA supplier: low risks (Human Rights Watch World Report 2023): https://www.hrw.org/sites/default/files/media_2023/01/WORLD_Report_2023_WEBSPREADS_0.pdf

Resulting measures: 1. See above

7

Indirect Supplier - Risk Analysis 2023

Type	Supplier	Supplier #	Location	Country Risk	Impact/Severity	Risk Score	Notes
				1-3 (Low, 3/High)	1-3 (Low, 3/High)	>10 = action plan needed	
Printer G	Andico/Onion Carbons						
Drums	Andico	71113	USA	1	3	5	USA supplier, low risk
Drums	HC Starck GmbH	71947	Germany	1	5	5	EU supplier, low risk
Pallets/Dunnage	Bluewater Pallet	64799	Canada	1	3	3	Canada supplier, low risk
Furnace Parts	RCM FURNACES INC	64584	USA	1	5	5	USA supplier, low risk
Casketing & Tooling	A.R. Thomson Group	84790	Canada	1	5	5	Canada supplier, low risk
Print Tapes etc	Abel Print Control	77877	Canada	1	1	1	Canada supplier, low risk
Misc Parts	ACKLANDS - SPANINGER INC.	84009	Canada	1	3	3	Canada supplier, low risk
Heat Exchangers	Amalgam	82088	Canada	1	3	3	Canada supplier, low risk
Misc Awards & Plaques	All Seasons Trophies & Signs	70866	Canada	1	5	5	Canada supplier, low risk
Mechanical Fabrications	Alliance Fabricating Ltd	78149	Canada	1	3	3	Canada supplier, low risk
MRO Parts	Analys, Jena US LLC	69085	USA	2	3	3	USA supplier, low risk
Lab Equipment & Parts	APK THERMAL	78929	USA	2	3	3	USA supplier, low risk
MRO Parts	ARGO Engineering Inc.	77851	USA	1	2	2	USA supplier, low risk
Printer G	ATI	84570	Germany	1	1	1	Germany supplier, low risk
Compressor Parts	ATLAS COPCO COMPRESSORS CANADA	84541	Canada	2	5	10	Canada supplier, low risk
Lab Equipment & Parts	ATS Scientific Inc.	70577	Canada	1	5	5	Canada supplier, low risk
IT Supplies & Equip	Avolution Multimedia	80719	Canada	1	5	5	Canada supplier, low risk
IT Supplies & Equip	Baystar Business Solutions	84174	Canada	3	2	6	Canadian supplier, low risk
Promo Materials	Big Bang Promotional Products Inc	70777	Canada	1	5	5	Canada supplier, low risk
Burner Parts	Black & McDonald Limited	81684	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Bray Sales Ontario	84271	USA	1	2	2	USA supplier, low risk
MRO Parts	Burford Injection Inc	84271	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Canada Bearings L	64534	Canada	1	5	5	Canada supplier, low risk
MRO Parts	Canadian IPG Corporation	84526	Canada	1	2	2	Canada supplier, low risk
MRO Parts	CANADIAN BEARINGS L	64534	Canada	1	2	2	Canada supplier, low risk
HVAC	CARMICHAEL ENGINEERING LTD.	64814	Canada	1	3	3	Canada supplier, low risk
MRO Parts	CB Automation Inc.	79902	USA	2	2	2	USA supplier, low risk
Radios	Celent Communications Ltd	71265	Canada	1	1	1	Canada supplier, low risk
MRO Parts	CEM Specialties Inc.	69845	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Cherline Tognati & Co	71375	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Classic Automation LLC	77298	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Classic Automation LLC	77298	Canada	1	2	2	Canada supplier, low risk
MRO Parts	CM FURNACES INC	64585	USA	1	2	2	USA supplier, low risk
MRO Parts	Comarco Equipment Limited	83088	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Compass Wire Cloth Corp.	70754	USA	2	5	10	USA supplier, low risk
MRO Parts	Contra Valve Inc.	77145	Canada	2	2	2	Canada supplier, low risk
IT Supplies & Equip	DATA Communications Management Corp.	70393	Canada	1	2	2	Canada supplier, low risk
MRO Parts	DAVIS CONTROLS LTD	65178	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Deer Valley Mfg. Co	69113	Canada	1	2	2	Canada supplier, low risk
MRO Parts	DIOWEL KARN	80081	USA	1	3	3	USA supplier, low risk
MRO Parts	Dry Coolers Inc.	80081	USA	1	3	3	USA supplier, low risk
Electrical parts	Eaton Industries (Canada) Company	78478	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Ecan Industries	81852	USA	1	5	5	USA supplier, low risk
MRO Parts	EMCO Corporation	70902	Canada	1	2	2	Canada supplier, low risk
MRO Parts	EMD Millipore Corporation	85290	USA	1	5	5	USA supplier, low risk
Compressor Parts	ENDRESS & HAUSER CANADA LTD.	64774	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Enraf Manufacturing	78701	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Enraf Manufacturing	84761	Canada	1	2	2	Canada supplier, low risk
House/MRO	Eriks Industrial Services LP	84867	Canada	1	2	2	Canada supplier, low risk
Electrical parts	ESAC Electrical & Systems	77941	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Eurosec	80523	EU	1	2	2	EU supplier, low risk
MRO Parts	Ewert Automation Inc.	84920	Canada	1	2	2	Canada supplier, low risk
MRO Parts	FESTO Inc.	82549	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Fillfab Company	70551	Canada	1	2	2	Canada supplier, low risk
Lab Equipment & Parts	FLIKER SCIENTIFIC LLC	68853	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Fluorocore	64469	Canada	1	2	2	Canada supplier, low risk
Lab Equipment & Parts	Forster Instruments Inc.	84639	USA	1	5	5	USA supplier, low risk
MRO Parts	Franklin Empire	80042	Canada	1	2	2	Canada supplier, low risk
Electrical parts	GESCAN	64961	USA	2	5	10	USA supplier, low risk
MRO Parts	GFS CHEMICALS INC	69831	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Global Industrial Canada	85424	Canada	1	2	2	Canada supplier, low risk
MRO Parts	GREAT LAKES INDUSTRIAL CONTROLS	84518	Canada	1	2	2	Canada supplier, low risk
Drums	GTA Compressor Solutions Inc	77092	Canada	1	5	5	Canada supplier, low risk
Compressor Parts	H.Q.N. INDUSTRIAL FABRICS	66327	Canada	2	2	2	Canadian supplier, low risk
MRO Parts	HAINES FRONTIER PRINTING LTD	65561	Canada	2	2	2	Canadian supplier, low risk
MRO Parts/Hoses	HALLMARK HOSE HEADQUARTERS	64523	Canada	1	2	2	Canada supplier, low risk
Service	Hawkeye Bird Control Inc	84634	Canada	1	2	2	Canada supplier, low risk
MRO Parts	HAYWARD GORDON ULC	65529	Canada	1	2	2	Canada supplier, low risk
Printer G	Hexonics GmbH	54270	EU	4	5	20	EU supplier, low risk
Printer G	Hexonics GmbH	80339	EU	2	5	20	EU supplier, low risk
Printer G	Hubbell Electric Mfg. Corporation	84688	USA	1	2	2	USA supplier, low risk
Printer G	HURON REPRO GRAPHICS	64888	Canada	1	2	2	Canada supplier, low risk
MRO Parts	IFM Ejector Canada Inc.	82070	Canada	1	2	2	Canada supplier, low risk
Clothing	Impageware a division of Mark's	71207	Canada	2	1	2	Canadian supplier, low risk
MRO Parts	Indulpharm Group Canada	71480	Canada	1	2	2	Canada supplier, low risk
MRO Parts	Industrial Metal Fabricators	71681	Canada	1	2	2	Canada supplier, low risk
Lab Equipment & Parts	Industrial Scientific Corp.	80731	Canada	2	5	10	Canada supplier, low risk
IT Supplies & Equip	Inlight Canada Inc	90920	Canada	1	2	2	Canada supplier, low risk
Chassis	Intelligent Light	80051	Canada	2	2	2	Canada supplier, low risk
Electrical parts	Ithraa GmbH	84922	EU	1	5	5	EU supplier, low risk
MRO Parts	Ivys Adsorption Inc.	79741	EU	1	2	2	EU supplier, low risk
MRO Parts	Joel Inc	79741	EU	1	2	2	EU supplier, low risk
MRO Parts	Joel GmbH & Co. KG	52274	EU	1	5	5	EU supplier, low risk
MRO Parts	Karl Dünge Inc.	78134	USA	1	2	2	USA supplier, low risk
Engineering Services	Kenit Canada Ltd	64619	Canada	1	1	1	Canada supplier, low risk
Water	Keim Water Systems Inc.	71532	Canada	1	1	1	Canada supplier, low risk

7

MRO Parts	Wares Valve GmbH	80798	EU	1	2	2	EU supplier, low risk
Electrical parts	WEGCO	66812	Canada	1	1	1	Canada supplier, low risk
IT Supplies & Equip	WESTBURN ELECTRIC	82552	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Western I.T. Group	84689	Canada	1	1	1	Canada supplier, low risk
MRO Parts	Western Valve & Filling Ltd	65401	Canada	1	1	1	Canada supplier, low risk
Clothing	Work Authority	79551	USA	2	1	2	Canadian supplier, low risk. Using boxes primarily sourced offshore in compliance with local import laws. Purchased through local distributors.
MRO Parts	WS Thermal Technology Inc	78135	USA	1	5	5	USA supplier, low risk
MRO Parts	Xenon Advanced Healing	61983	USA	1	5	5	USA supplier, low risk
IT Supplies & Equip	XEROX Canada Ltd	66852	Canada	1	1	1	Canada supplier, low risk

Indirect Supplier - Risk Analysis 2023 Action Plans

For each supplier with combined score <10

Type	Supplier	Supplier #	Location	Country Risk	Impact/Severity	Risk Score
Graphite Parts	Henschke GmbH	54270	EU	1-5 (1 low, 5 high) 4	1-5 (1 low, 5 high) 5	>20 = action plan needed 20
Summary: Henschke poses a significant risk as parts made in China, sent to Germany and then shipped to Canada. Henschke doesn't have control over the day-to-day operations of the China facility.						
Actions: Audit process/procedure & training records for China factory to ensure process & procedure is up to current labour standards, all employees are trained on these procedures and periodic audits are conducted to ensure compliance.						
Results: Documentation submitted and reviewed in detail which showed Henschke & their Chinese contract manufacturer to be in compliance with generally accepted labour standard & practises.						
Recommendations: Corporate/Group on site audit on Chinese contract manufacturer in future						