

## Responsible Minerals Sourcing Policy

Avon Specialty Metals (ASM) is a UK-based recycler specialising in refractory metals and high-temperature alloys, including Tantalum, Tungsten and Cobalt in their metallic and alloyed forms. ASM processes three categories of material: -

1. *Secondary (scrap) materials*
2. *Recycled products produced exclusively from scrap*
3. *Primary materials sourced only from approved RMI-conformant smelters*

ASM does not handle minerals or ores in any form and is therefore not involved in materials subject to Class 7 Transportation Regulations. The company also does not currently handle Tin or Gold.

We unequivocally condemn the unlawful exploitation of mineral resources in any part of the world and fully support international efforts to end violence, human rights abuses, and environmental harm in the Democratic Republic of the Congo (DRC) and its surrounding countries (the “Conflict Region”). ASM is firmly committed to maintaining a conflict-free, not Congo-free supply chain. This means we support the responsible sourcing of conflict minerals (Tantalum, Tin, Tungsten, Gold — “3TG” — and Cobalt) from the region, provided such materials do not directly or indirectly finance or benefit armed groups.

In line with this commitment, ASM follows a policy of continuous improvement and conducts due diligence consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We purchase only materials that are verified as conflict-free and that meet all relevant ethical, environmental, and regulatory requirements.

We acknowledge the SEC’s final Conflict Minerals Rule, issued under Section 1502 of the 2012 Dodd-Frank Wall Street Reform and Consumer Protection Act, and remain committed to supporting our customers in meeting their own due diligence and reporting obligations. Accordingly, ASM will source metals only from suppliers who adhere to our Supplier Code of Conduct, which strictly prohibits human rights abuses—including forced or compulsory labour, child labour, and all unethical practices.

ASM’s shareholders are voluntary supporters of a range of international initiatives and organisations dedicated to responsible business practices, including the Responsible Minerals Initiative (RMI), United Nations Global Compact, World Economic Forum – Partnership Against Corruption Initiative, Global Reporting Initiative (GRI), Minor Metals Trade Association (MMTA), and the Tantalum-Niobium International Study Center (TIC).

In support of our Conflict Minerals Sourcing Policy, ASM commits to the following actions:

- Conduct due diligence with all relevant suppliers in accordance with the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and encourage our suppliers to cascade these requirements throughout their own supply chains.

- Embed the principles of this policy into all legally binding purchase contracts and rigorously monitor related transactions.
- Provide, and expect suppliers to provide, full due diligence information demonstrating that all 3TG and Cobalt materials within our supply chain are conflict-free.
- Voluntarily apply the same due diligence standards to additional metals beyond the regulatory scope—such as Niobium.
- Rely on recognised industry initiatives, including the Responsible Minerals Initiative (RMI), to verify that all metals we procure originate from:
  - a) RMI-approved conflict-free smelters, or
  - b) Scrap/recycled sources.
- Ensure all suppliers maintain traceability records for a minimum of five years and provide such information to ASM upon request.
- Collaborate with suppliers and industry partners to support solutions that enable products verified as DRC conflict-free.
- Communicate our policy and progress publicly, including through our corporate website, annual Corporate Responsibility Report, to our entire workforce (via the SafetyCulture Platform), and Supplier Code of Conduct.
- Assist customers and supply chain partners in implementing and strengthening their own conflict minerals compliance programmes.
- Require all suppliers to submit completed Conflict Minerals Reporting Templates (CMRTs) issued by the RMI.
- Commission independent third-party audits of ASM's processes to ensure our procurement systems remain robust, transparent, and conflict-free.

ASM is committed to building long-term, collaborative relationships with suppliers to achieve meaningful, lasting, and sustainable improvements across our supply chain. When risks are identified, we will work proactively with suppliers to assess, address, and mitigate those risks in alignment with the OECD Due Diligence Guidance, with reference to Annex II: Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.

However, ASM will discontinue business with any supplier found to be in deliberate or persistent breach of our Sourcing Policy or the OECD Guidelines.

### **Grievance Mechanism & Reporting**

This Policy is subject to regular review and will be updated as required to ensure ongoing compliance and relevance. Any concerns regarding the content or implementation of this Policy may be reported directly to ASM's Board of Directors through our formal grievance channels:

*Email: [conflictfree@avonspecialtymetals.com](mailto:conflictfree@avonspecialtymetals.com)*

*Hotline (UK): +44 1452 874506*