

RMAP Due Diligence Report

1. COMPANY INFORMATION

a.	Company Name	:	Metallurgical Products (India) Pvt. Ltd.
b.	Plant Location	:	T-27, MIDC-Taloja Industrial Area, District Raigad – 410208, Maharashtra, India
c.	RMI Smelter ID	:	CID001163
d.	3TG Material Processed	:	Tantalum
e.	Report Period	:	April 1, 2023 – March 31, 2024

2. RMAP ASSESSMENT SUMMARY

a.	Last RMAP Assessment	:	December 8, 2023
b.	Assessment Period	:	June 7, 2022 – December 5, 2023
c.	Assessment By	:	RMI Audit Review Committee
d.	Conformance Status	:	Conformant
e.	Assessment Summary URL	:	http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/smelter-refiner-lists/tantalum-smelters-list/conformant-tantalum-smelters/

3. COMPANY MANAGEMENT SYSTEMS

a.	Supply Chain Policy	:	Metallurgical Products (India) Pvt. Ltd. is committed to sourcing its Tantalum raw materials in an ethical and responsible manner and producing validated, conflict-free Tantalum based products for the global industry. We strongly support the RMI (Responsible Minerals Initiative) program founded by members of the RBA (Responsible Business Alliance) and GeSI (Global e-Sustainability Initiative) and conduct our business in accordance with its principles. Our sourcing practices conform to the RMAP (Responsible Minerals Assurance Process) Standard for Tantalum that is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition and our practices are validated by annual, RMI-approved third-party audits. Our full policy is publicly available at www.mpil.co.in .
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b.	Management Structure & Responsibility	:	<p>An RMAP-Team comprising senior management has been set up for compliance with the applicable RMAP Standard for Tantalum including:</p> <ul style="list-style-type: none"> i. Due diligence systems ii. Procedures to identify CAHRAs iii. In-house training iv. Preservation of records v. Addressing any concern or grievance in relation to our sourcing of Tantalum raw materials
c.	Internal Systems & Controls	:	<ul style="list-style-type: none"> i. Prior to sourcing any Tantalum raw material, we conduct an in-depth assessment covering, but not necessarily limited to the following: ii. <ul style="list-style-type: none"> ▪ Supplier due diligence ▪ Identification of the type of material offered and applicability of origin-determination & chain-of-custody requirements ▪ In the case of minerals, determining the origin and following a defined procedure to identify CAHRAs and reviewing red-flag risks in the context of the proposed transaction ▪ Where no CAHRA is identified, we proceed with the sourcing with basic due diligence prescribed in the RMAP Standard for Tantalum ▪ Where a CAHRA is identified, we may try to adopt a suitable strategy to mitigate the risks identified and then proceed with the sourcing with enhanced due diligence prescribed in the RMAP Standard for Tantalum. However, where risk mitigation appears not feasible or unacceptable, then we do not proceed with the sourcing at all iii. Our purchase contracts clearly communicate our Tantalum Supply Chain Policy to suppliers and incorporate disclosure requirements for the origin and chain-of-custody documentation et. al. (as applicable) for each shipment made to us iv. Our internal material control systems identify & keep track of Tantalum units v. All supplier payments are made in accordance with applicable Govt. of India rules and regulations

		<ul style="list-style-type: none"> vi. Grievance Redressal Mechanism is in place vii. RMAP Training – two or more per year viii. Internal systems and processes are reviewed annually, and their effectiveness validated by an RMI approved, third party audit
d.	Record Keeping	: Five-year records to be preserved

4. RISK IDENTIFICATION

a.	Procedure to Identify CAHRAs	: <ul style="list-style-type: none"> i. Conflict-Affected & High-Risk Areas (CAHRAs) are defined as: <ul style="list-style-type: none"> ▪ Areas in a state of armed conflict with widespread violence ▪ Areas witnessing weak or non-existent governance and institutional weakness ▪ Areas characterised by widespread human rights abuses and widespread, systematic violations of international humanitarian laws ii. We follow an index-based procedure for identification of CAHRAs, covering three key criteria of the definition of CAHRAs consistent with the OECD Due Diligence Guidance Third Edition. Each criterion is reviewed against national-level thresholds obtained from RMI-recommended open sources and accordingly sources of mineral supply are classified as a CAHRA or a non-CAHRA. iii. The reference sources used are: <ul style="list-style-type: none"> ▪ Global Peace Index - [Conflict] ▪ Know Your Country - [Governance] ▪ P3 Fragile States Index - [Human Rights] iv. As per the RMI RMAP Standard, countries as outlined in Section 1502 of the U.S.A. Dodd Frank Act, as well as the list of CAHRAs published by the European Commission pursuant to Article 14.2 of the European Union Regulation 2017/821 are considered as CAHRAs v. The procedures to identify CAHRAs are reviewed annually.
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b.	Know Your Counterpart	:	Corporate information of each supplier is obtained and OFAC List / EU Sanctions List referred to in our Supplier Review process
c.	Red Flag Review	:	<p>The following points are taken into consideration:</p> <ul style="list-style-type: none"> i. Plausibility of supply ii. Transit through a CAHRA iii. Supplier has operations in a known CAHRA
d.	Results	:	<p>All our Tantalum suppliers have completed and returned our KYC Questionnaire form. We also obtained copies of incorporation / business registration documents for each supplier. We then reviewed the information received and cross-checked it against relevant sanction lists. Later documents accompanying each shipment were matched to the material received and examined for inconsistencies. During this reporting period no red flags were identified and no evidence of widespread conflict, human rights abuses or bribery / misrepresentation of origin was found in our Tantalum supply chain.</p>

5. RISK MANAGEMENT

- i. We are committed to following the above-mentioned due diligence & procedures on a continual, ongoing basis and to be improved over time
- ii. Our Tantalum Supply Chain Policy is publicly available & communicated to suppliers in our purchase contracts along with applicable disclosure requirements
- iii. Documents received from suppliers are reviewed to identify any inconsistencies / discrepancies and matched to the material received
- iv. Where a serious supply chain risk is identified, it will be brought to the notice of our RMAP-Team who shall review in the context of our materials and suppliers and adopt a suitable mitigation strategy that could include:
 - Continuing to source by incorporating additional measures to safeguard against the risks identified
 - Temporarily suspending sourcing
 - Disengaging completely where mitigation appears not feasible or unacceptable
- v. Where feasible, we work closely with our suppliers to identify and mitigate supply chain risks. In most cases we try and visit the operation sites of our mineral suppliers, interact with local communities and actively gain better understanding of the socio-economic environment.