

## H.C. Starck Group Raw Material Procurement Statement

H.C. Starck is one of the leading global manufacturers of technology metals tantalum, tungsten, niobium, rhenium and molybdenum. We are committed to ensuring safety, health and protection of the environment and of the people who come in contact with our products. As responsible corporate citizens, we meet and are continually striving to exceed governmental, industrial and environmental standards worldwide like Class7 Transportation Regulations.

We condemn all activities in connection with the unlawful exploitation of mineral resources, no matter where such activities take place. As part of this commitment we have implemented an on-going policy of only purchasing raw materials that are conflict-free and that meet the requirements of the OECD Due Diligence Guidance for Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The Conflict-Free Sourcing Initiative (CFSI) has declared H.C. Starck's tantalum and tungsten supply chain free of conflict materials and lists H.C. Starck as Conflict-Free Smelter (CFS). We are one of the few companies to pass consecutive audits under the Conflict-Free Smelter Program (CFSP) since the start of the program.

We are committed to actively supporting our customers with their diligence and disclosure requirements defined in section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to "Conflict Minerals" and the regulations promulgated thereunder by the U.S. Securities and Exchange Commission. H.C. Starck fully supports the position of the Organization for Economic Co-operation and Development (OECD) and the Dodd-Frank Act to avoid the use of ores and metals that finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries.

H. C. Starck is a member of the ITRI Tin Supply Chain Initiative (iTSCi), which has developed a due diligence system for a transparent raw material supply chain in conflict regions and monitors the implementation of the system in their member companies. In addition to that, H.C. Starck is a founding member of the Tungsten Industry—Conflict Minerals Council (TI—CMC) and also of the Public-Private Alliance for Responsible Minerals Trade (PPA) in support of government and private initiatives to develop conflict-free supply chain systems.

To guarantee that we purchase only conflict-free raw materials, we have implemented an approved Responsible Supply Chain Management System (RSCM). This system ensures efficient and competitive purchasing, and supports sourcing from suppliers that act in accordance with environmental and social sustainability. With a variety of control mechanisms, we perform thorough due diligence on all raw material offers based on current OECD and CFSI guidelines before we sign any delivery contracts. We continuously strive to become independent from surging volatility and speculations on the raw materials market. That is why we strongly focus on technology metal recycling to secure our conflict-free raw material supply chain. Using innovative technologies, we are recycling increasing volumes of post-industrial waste, slags, and scraps and turning them into high quality and high-performance technology metals.

**With strong recycling activities and certified procurement we ensure a safe, sustainable and competitive raw material supply for our customers, following strong ethical, social and environmental principles.**



Dr. Jens Knöll  
Chairman of the Board of the H.C. Starck GmbH

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