

ICD DUE DILIGENCE REPORT

1. Company Information

ICD Alloys and Metals LLC is a minor metals company who trades or recycles the 3TG metals tantalum and tungsten as either a pure metal or contained in compounds and alloys. The main operations, ICD Alloys and Metals LLC is located at 3946 West Point Blvd Winston Salem North Carolina 27103. A fully owned subsidiary, ICD Europe, is located at Units 7-11, Vantage Park, Coborn Ave, Sheffield S9 1DA, United Kingdom. Both companies conduct the same operations and sales.

Both ICD Alloys and Metals LLC ICD Europe Ltd are fully compliant with CFC2000:2022, a mine-to-market conflict free supply chain certification, ensuring that we meet all the requirements of the Dodd Frank Act S1502. Please click [here](#) for ICD Alloys and Metals certificate, and [here](#) for ICD Europe Certificate. In addition to CF2000:2022, ICD Alloys and Metals is certified by 3core² to ISO 9001 Quality Management Systems Standards. Please see [here](#) for certificate.

ICD Alloys and Metals is currently participating in the Responsible Minerals Initiative audit process and will announce our approval on this page when received. At this time, no CID number code is assigned.

2. RMI-DAP Assessment Summary

ICD Alloys and Metals has been undergoing our audit from September 2021 to July 2022. Arche Advisors conducted the initial assessment, the RMI appointed sourcing audit firm. The facility is currently working with RMI to complete corrective actions to address findings from this assessment.

3. Company Supply Chain

To avoid the use of conflict minerals, which directly or indirectly finances, or benefits armed groups and/or involves other serious human rights abuses in high-risk and conflict-affected regions (CAHRAs), ICD has developed a Supply Chain Policy. This policy is aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA-OECD Guidance). The policy covers all risks identified in Annex II of the OECD Guidance and its geographical scope is global. The company is committed to addressing any Annex II risks if any are identified.

The policy was reviewed and approved by senior management, which committed to support its implementation. The policy will be widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is available on ICD Alloy and Metals website [here](#).

4. Company Management System

ICD follows through on its commitment to Responsible Minerals Sourcing Management System by implementing the supply chain policy and has established an internal procedure for due diligence as follows:

- The company's President is responsible to oversee the due diligence program and risk management design and implementation.

- The company has assigned a due diligence program manager for each facility. For ICD Alloys and Metals, the VP of Manufacturing and for ICD Europe, the Managing Director. Each are responsible in their separate facilities for coordinating the work of affected departments including purchasing, quality, production, and shipping and receiving to ensure each department follows up on their roles and responsibilities to implement the due diligence program and report red flags and potential risks identified.
- Each facility independently conducts due diligence managements system training once a year for key staff from all relevant departments required in due diligence program. If there is an update to the program, each facility conducts additional training, as necessary.

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Internal Systems of Control

ICD has updated its Responsible Minerals Sourcing Management System to be aligned with OECD Guidance and RMI-DAP in June 2022. This includes the ICD Alloys & Metals Responsible Mineral Sourcing Policy, ICD Alloys & Metals Supplier Letter, Purchase Orders and Sales contracts to support Responsible Minerals Sourcing, and all controlled procedural documents.

ICD refers to RMI's grievance mechanism to collect information on grievances from interested parties.

Record Keeping System

ICD requires that all records relating to the Responsible Minerals Sourcing Management Systems are maintained for a minimum of five years.

Monitoring of Performance

All employees that implement aspects of the Responsible Minerals Sourcing Management Systems are encouraged to identify gaps or opportunities for improvement the management system.

The effectiveness and consistent implementation of each element of the Responsible Minerals Sourcing Management System shall be reviewed and evaluated annually.

5. Risk Identification

While ICD obtains the majority of tantalum and tungsten in the form designated as "scrap," products are purchased from primary smelter and refiners from low-risk of harm, ICD has procedures in place to identify risks in the supply chain that align with RMI-DAP and OECD guidance. The procedures include:

- Procedures to Identify Material-related Risks and Red Flags
- Procedure to Identify CAHRAs
- Procedure to Identify Supply Chain Risks



ICD is in the process of implemented the Know Your Counterparty (KYC) due diligence for all suppliers of secondary raw materials in accordance with the June 2018 RMAP Standard to assess potential risk.

All intermediate and secondary tantalum containing materials are fully compliant and consistent with the definitions listed in Annex V: Tantalum Material Types, located in the RMAP Assurance Process for Tin and Tantalum, dated June 1, 2018. KYC will then assess and identify risks to assure the supply chain for secondary raw materials is consistent with the standard.

Any risks identified are red flagged per procedure and reviewed by management to assure compliance. Any corrective actions necessary will be implemented in accordance with the policies and procedures as well.