

H.C. Starck Tungsten Powders Modern Slavery Act Statement

H.C. Starck Tungsten Powders provides high performance tungsten chemicals, tungsten metal and carbide powders, cast tungsten carbide and special carbide powders. These products, tailored to customer specifications, are made for the mechanical engineering and tool making, automotive and energy industry, aviation industry, and the chemical industry. Our customers benefit from the highest and consistent quality, as well as from a comprehensive product portfolio of ultrafine to coarse grain sizes.

Raw material for tungsten is known as “conflict mineral” according to the “OECD Due Diligence Guideline for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas”. The Guidelines do not announce conflicts only, but also the abuse of human rights, like modern slavery and human trafficking.

The UK Modern Slavery Act 2015 (“the Act”) creates offences and imposes a duty on businesses supplying goods and services in the UK to report each year on the steps they have undertaken to ensure their operations and supply chains are free of human trafficking and slavery. H.C. Starck Tungsten Powders does not and will not use forced, indentured or involuntary labour in any of its operations and will not knowingly utilize any supplier suspected of doing so.

H.C. Starck Tungsten Powders is committed to essential ethical standards. H.C. Starck Tungsten Powders maintains robust supply chain management systems that seeks to ensure, through regular verification, audit and certification that its raw materials are sourced in a socially responsible manner that does not support those engaged in human trafficking. Besides responsible supply chain management (RSCM) audits conducted by own auditors H.C. Starck Tungsten Powders is a member of TI-CMC, RMI and iTSCi, ensuring that our supplier of raw material, where the abuse of human rights may be a significant risk, meet the OECD Due Diligence Guideline. H.C. Starck Tungsten Powders is audited regularly by an independent third party and therefore certified as “conflict free smelter”.

H.C. Starck Tungsten Powders’ Code of Conduct states the company’s commitment to uphold all internationally-recognized human rights, such as the United Nations Guiding Principles on Business and Human Rights. More specifically, H.C. Starck Tungsten Powders is committed to ensuring its operations and supply chains are free of human trafficking and slavery and has implemented and utilizes a responsible supply chain management system (RSCM) that

monitors and audits high risk areas and potential affected populations. H.C. Starck Tungsten Powders also requires its suppliers to take all necessary steps to demonstrate that their operations and their supply chains strictly comply with these commitments.

This statement is made pursuant to section 54(1) of the Act and constitutes the slavery and human trafficking statement for the financial year ending December 2019.



Dr. Hady Seyeda

CEO H.C. Starck Tungsten Powders

Goslar, July 2019

Questions regarding this statement should be directed to the H.C. Starck Tungsten Powders Legal Department