

H.C. Starck Tungsten Powders Modern Slavery Act Statement 2023

H.C. Starck Tungsten Powders ("HCS"), a Member of the Masan High-Tech Materials ("MHT") Group 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.

The raw materials for Tungsten products are known as potential "conflict minerals" 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. Here we refer to our annual OECD Step 5 report. HCS 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.

HCS is committed to high ethical standards. HCS maintains robust supply chain management systems that seeks to ensure, through regular training, review, 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. HCS 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. HCS is audited regularly by an independent third party and therefore certified as "conformant smelter". During the current audit, the independent auditor also came to the conclusion that HCS's RSCM fully complies with the relevant requirements.

In 2023, the German "Lieferkettensorgfaltspflichtengesetz" (LkSG; Supply Chain Duty of Care Act) came into force. Due to its size, H.C. Starck Tungsten Powders is not an obligated company within the meaning of the LkSG. Nevertheless, we are aware of our responsibility within the supply chain and have therefore committed ourselves to comply with the requirements of the law as far as applicable to us. This concerns, for example, the risk analysis in accordance with the LkSG. As part of a gap analysis, our RSCM was reviewed by independent third parties with regard to the LkSG and the resulting recommendations were implemented.

MHT Code of Conduct states the company's commitment to uphold all international-recognized human rights, such as the United Nations Guiding Principles on Business and Human Rights. More specifically, HCS is committed to ensuring its operations and supply chains are free of human trafficking and slavery. Within our RSCM, HCS monitors and audits high risk areas and potential affected populations. HCS 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 (incl. the actual OECD Step 5 report) is made pursuant to section 54(1) of the Act and constitutes the slavery and human trafficking statement for the financial years ending December 2023.



Dr. Hady Seyeda

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