

01.06.2020

Raw Materials Supply Chain Policy

Plansee is committed to ensuring that our raw materials are sourced responsibly for all our group locations. Supplier Policy and Code of Conduct set forth our corporate commitments to ethical business practices and legal compliance and we only do business with suppliers that adhere to these commitments.

Plansee only buys from smelters that are included on the Conformant Tantalum Smelter List of the Responsible Minerals Assurance Process (RMAP). (<http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/smelter-refiner-lists/tantalum-smelters-list/conformant-tantalum-smelters/>)

The headquarter in Reutte is 100 % responsible for the sourcing process. The groups only 2 plants with tantalum processing capability located in Reutte/Austria and Liezen/Austria have implemented processes and procedures to ensure that our sourcing does not support or benefit armed conflict groups or involve serious abuses of human rights. Our plant in Liezen/Austria is only processing material.

We endorse the activities of the Organization for Economic Co-Operation and Development (OECD) and use the recommendations in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (OECD Guidance) as the model for our own due-diligence.

In accordance with the OECD Guidance Annex II (<https://www.oecd.org/daf/inv/mne/OECD-Due-Diligence-Guidance-Minerals-Edition3.pdf>), Plansee strongly condemns all activities and will refuse any material, which we believe benefitted or supported armed rebels/terrorist groups through illegal finance or other activities or involved serious human rights violations associated with the extraction, handling, transport or trade of minerals, including:

- Serious abuses (i.e. torture, cruel, inhuman and degrading treatment; forced for compulsory labor; worst forms of child labor; human rights violations and abuses such as widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide).
- Direct or indirect support to non-state armed groups.
- Direct or indirect support to public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of minerals.
- Money laundering.
- Non-payment of taxes, fees and royalties to governments.

Should Plansee, through our ongoing due-diligence and market intelligence, discover that our suppliers are engaged in practices that do not meet our responsible sourcing requirements, we would immediately inform the supplier that we are suspending sourcing from said supplier and develop a plan to mitigate the identified risks. Should the mitigation fail to resolve the identified risks to our satisfaction, or should we find further activities which indicate extreme abuses, dishonesty, or situations where a supplier is unwilling to assist in our due-diligence, Plansee will immediately discontinue any activity with said supplier.

In alignment with the OECD Guidance, Plansee is committed to be audited by an independent 3rd party to ensure transparency and assurance to our customers that Plansee's supply chain due diligence policy is verifiable and effective.

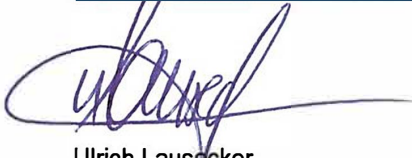
Plansee communicates the included sourcing policy to suppliers and customers and makes it publicly available for review. Additionally, Plansee requires that suppliers contractually acknowledge our policy and commit to providing information, documentation, and accommodations for site-visits as necessary for conducting our own due diligence.

In alignment with the OECD Guidance, Plansee annually publishes and makes publicly available the Plansee Due Diligence Reports for Minerals Supplies from Conflict Affected and High-Risk Areas. (www.plansee.com)


Our Director Strategic Purchasing, Sandra Hominger (sandra.hominger@plansee.com), is assigned with responsibility for ensuring that all Tantalum is sourced in a legitimate and ethical manner and according to our policies and procedures.

In case of concerns related to Plansee's sourcing and sourcing practices, all employees at Plansee, suppliers, customers and other stakeholders are encouraged to contact the Director Strategic Purchasing or anonymously communicate their concerns related to Plansee, at

<http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/grievance-mechanism/>



Ulrich Lausecker
Member of the Executive Board



Sandra Hominger
Director Strategic Purchasing