Plansee SE Public Due Diligence Report for FY2020/21
(March 1, 2020 February 28, 2021)


1) Company information:

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Plansee SE</th>
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</thead>
<tbody>
<tr>
<td>Company location:</td>
<td>Metallwerk-Plansee-Straße 71, 6600 Reutte, Austria</td>
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<tr>
<td>STG material processed:</td>
<td>Tantalum</td>
</tr>
<tr>
<td>Webpage:</td>
<td><a href="http://www.plansee.com">www.plansee.com</a></td>
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</tbody>
</table>

Plansee is an expert in the field of molybdenum, tungsten, tantalum, niobium and chromium components.

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-refs/tantalum-smelters-list/conformant-tantalum-smelters/) The headquarter in Reutte is 100 % responsible for the sourcing process.

2) RMAP Assessment Summary:

| Date of last RMAP assessment | June 24, 2020 |
| Assessment period | July 1, 2018 – June 24, 2020 |
| Assessment firm | RCS Global |

The status and the results of the previous assessment and the above listed assessment can be found at: https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/downstream-program/ and https://www-plansee-com.azureedge.net/fileadmin/user_upload/Audit_Summary_Report_Plansee.pdf.

3) Company Supply Chain Policy:

As set forth in our Supplier Policy, Code of Conduct, and RAW Materials Supply Chain Policy, Plansee is committed to responsible sourcing of all our raw materials and we require that all suppliers are committed to equally high standards. Plansee’s Supplier Policy and Code of Conduct is part of the company management system. Our quality management systems and certifications can be found at: https://www.plansee.com/en/about-us/certification.html.

4) Company Management System related to Responsible RAW Materials Sourcing:

The headquarter in Reutte is 100 % responsible for the sourcing process. and has implemented processes and procedures to ensure that our sourcing does not support or benefit armed conflict groups or involve serious abuses of human rights.

Plansee has structured its Tantalum raw material procurement with one raw material purchasing manager being responsible for the procurement of all Tantalum raw materials for Plansee. The purchasing manager is the gatekeeper for Plansee and oversees that all purchases of Tantalum raw materials are fully documented and that all suppliers are RMAP certified.

Our Director Strategic Purchasing, Sandra Horninger (sandra.horninger@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.

Plansee uses SAP for tracking and recording of all raw material supplies from purchase, logistics, analyses and consumption. Plansee uses distinct part numbers for each raw material type which ensures that purchased raw material type per Purchase
Order is identical to received material type. The Plansee receiving department is highly experienced in identifying raw material types and any discrepancies are reported to the supply chain manager. All incoming raw materials are sampled and analyzed.

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, the Legal Department or anonymously communicate their concerns related to Plansee at compliance-plansee-group@fs-pp.de or at http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/grievance-mechanism/.

5) Risk Identification:

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/)

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.

Plansee has implemented a standard process for Supplier Selection and Qualification (Evaluating/Selecting Suppliers per ISO Standard). All suppliers of raw material are required to complete an extended supplier form as well as sign a supplier declaration stating that any material sold to Plansee is sourced according to our Supplier Policy and Code of Conduct together with Plansee’s Raw Materials Supply Chain Policy.

Plansee has strict rules and regulations when it comes to bribery and fraudulent misrepresentation of the origin of minerals, money laundering and non-payment of taxes, fees and royalties to governments. Therefore, Plansee relies 100 % on RMI certified smelters when sourcing tantalum.

During the period covered under this report no major risks were identified.

6) Concluding comments:

In the period reported Plansee only sourced Tantalum from companies on the Conformant Tantalum Smelter List of the RMAP.

Sandra Hominger
Director Strategic Purchasing

March 2021