



"Wolfram" company" JSC
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Conflict Minerals Policy

WOLFRAM Company JSC is the biggest producer of tungsten products in Russia and one of the key players on the international tungsten market, developing its own tungsten mining project in Russia.

Our company develops favorable working conditions and is guided by such values as: environmental protection, observance of human rights and maintaining business ethics. We are opposed to any activity that directly or indirectly violates the law.

Our company purchases exclusively raw materials with traceable origin and accompanied with official certificates of origin, and also avoids transactions with traders. We work only with large Russian producers of tungsten concentrate and global conflict-free mines, official suppliers of secondary raw materials which have all necessary permits and licenses. All our suppliers are required to undergo an internal audit conducted by specialists of WOLFRAM Company JSC.

In order to avoid connection with any business in the conflict-affected and high-risk areas (CAHRA), and guarantee our consumers that they are not directly or indirectly involved in illegal activities, including supporting illegal armed groups from conflict territories, WOLFRAM Company JSC works only with fully verified suppliers and uses only raw materials duly checked in accordance with the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

In alignment with the recommendations in Annex II and the Supplement on Tin, Tantalum and Tungsten of the OECD guidance, our company has introduced a material management system named as Responsible raw material supply management system that, apart other measures, ensures:

- risk identification and management,
- on-the-ground assessments of current mines and would-be mines in the supply chain,
- Reasonable Country of Origin and transportation routes examination,
- many-sided training of responsible raw material sourcing for relevant employees,
- verification of suppliers against relevant sanction lists.

In accordance with the OECD Guidance Annex II, WOLFRAM Company JSC strongly condemns all activities, and will refuse any material, which we believe benefits or supports armed rebels/terrorist groups through illegal finance or other activities or involved in serious human rights violations associated with the extraction, handling, transport or trade of minerals, including:

- Serious abuses (i.e. any forms of torture, cruel, inhuman and degrading treatment; any forms of forced or compulsory labour, which means work or service, which is exacted from any person under the menace

of penalty and for which said person has not offered himself voluntarily; 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 (i.e. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or illegally tax or extort intermediaries, export companies or international traders.).
- 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.

We will immediately put on hold or interrupt relations with suppliers in case of any risk spotted regarding receiving from or linked to any party committing serious abuses or related with the material from identified CAHRAs as specified below.

According of our Conflict Minerals Policy, we will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

Should of any above-indicated risk emerged, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk.

Main steps of the risk management strategy are as follows

1. Report findings to the senior management, outlining the information gathered and the actual and potential risks identified in the supply chain risk assessment;
2. Put a suspicious lot of material in quarantine at facility;
3. Request additional information, documents and clarification from a supplier regarding detected discrepancies.

Our risk mitigation strategies include

- Continuing trade throughout the course of measurable risk management efforts;
- Temporarily suspending trade while pursuing ongoing mitigation efforts;
- Disengaging with a supplier in cases where mitigation appears not feasible or unacceptable;
- Inform relevant local and central governmental agencies of abuses, breaching policy and potential exploitative practices occurring in the country;

In particulars, the following actions for risk mitigations measures are approved to put in place in occasion of issues related with:

1. Security and related issues

- Alert relevant central government authority (e.g. Ministry of Mines) of abusive and exploitative practices occurring in the supply chain;
- Support the establishment of community forums to share and communicate information;

2. Bribery and fraudulent misrepresentation of minerals origin

- All concerned suppliers and intermediaries are requested to disclose downstream information: the nature of chain of custody or supply chain transparency systems in place of a certain supplier; to verify information generated by chain of custody and transparency systems from a particular mine; to reveal the engagement of the company in capability training and/or other industry initiatives for supply chain due diligence.

3. Money laundering

- Use of supplier, customer and transactional red flags to identify suspicious behavior and activities;
- Identify and verify the identity of all suppliers, business partners and customers;
- Report suspicious behavior of criminal activity to local, national, regional and international law enforcement agencies.

Any suspected noncompliance with the Conflict Minerals Policy can be reported to alert@wmcyr.ru. Your message will be investigated in all anonymity. Any concern party is invited to report grievances to the above-mentioned email or to use relevant grievance mechanisms such as www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/grievance-mechanism/.

Our Expectation of Suppliers

WOLFRAM Company JSC expects each supplier to do as follows:

- Adopt a policy of responsible sourcing of minerals and pass this requirement through its supply chain;
- Implement due diligence processes to support that policy;
- Source materials from socially responsible suppliers. Where a risk is identified take required actions to remove from the supplier the Supply Chain;
- Use RMI legitimate smelters, identified as Responsible Minerals Assurance Process (RMAP) approved.
- Provide all necessary information that may be requested regarding the sources.

- All transactions are in full compliance with all economic sanctions, trade embargoes and export control laws, regulations, decrees, orders or requirements which may be applicable to a certain material.
- No one of corporate officers, directors, stakeholders and beneficial owners is subject of Sanctions administered or enforced by the United Nations, the United States, the European Union or any other relevant sanctions authority.

CAHRAs for 2021

The CAHRAs list of WOLFRAM Company JSC for the year 2021 includes the following areas:

Angola
Afghanistan
Bangladesh
Bahrain
Benin
Burkina Faso
Burundi
Cameroon
Central African Republic
Chad
Colombia
Democratic Republic of the Congo
Djibouti
Equatorial Guinea
Ecuador
Egypt
El Salvador
Eritrea
Ethiopia
Guatemala
Guinea
Honduras
Iran
Iraq
Kenya
Lebanon
Lesotho
Libya
Malawi
Mali
Mauritania
Mozambique
Myanmar
Nicaragua
Niger
Nigeria
North Korea
Pakistan
Palestine
Republic of the Congo
Rwanda
Saudi Arabia
Senegal
Somalia
South Sudan
Sudan
Swaziland
Syria
Tanzania
Trinidad and Tobago
Uganda
Ukraine
Vanuatu
Venezuela
Yemen
Zambia
Zimbabwe

Sanctions

Wolfram Company JSC reserves the right to cancel contracts and disengage with the supplier unilaterally, in the event of violations of the Conflict Minerals Policy of WOLFRAM Company JSC, edition of July 1st, 2021, or, in case of partial or complete failure to submit or concealment of information that should be provided within the framework of Management systems of responsible supplies of raw materials of WOLFRAM Company JSC that is aimed to accomplish due diligence for mineral sourcing in accordance with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High Risk Areas.

In case of any above-mentioned transgressions, WOLFRAM Company JSC has to report suspicious behavior or criminal activities to local, national, regional and international law enforcement agencies.

General Director



Efim N. Pletenev