Public Due Diligence Report for Responsible Minerals Sourcing

1. **Company Information**
Tin Technology & Refining was established in 2013 as the reclaim division of Nathan Trotter & Co. While Nathan Trotter remains a majority partner, Tin Tech operates as an independent company. Tin Tech only processes and recycles secondary metals and does not process concentrates in any form. Tin Tech operates from a single plant located in West Chester, PA.

2. **RMAP Assessment Summary**
In October of 2022, Tin Tech successfully completed an audit of its Risk Based Assessment Program conducted by Arch Advisors and was found to be conformant in all policies and standards. Tin Tech was initially accepted into the Risk Based Assessment Program following a primary assessment on August 29th 2018 and a subsequent audit in August of 2019. The audits were conducted by SCS Global Services and Arch Advisors respectively. All auditors are appointed by RMI. Tin Tech is on a three-year audit cycle with RMI and will annually provide RMI with updates on the company Supply Chain Policy and any changes to all sourcing practices within the company, as per the conditions of acceptance to this program. The next on-site audit is scheduled for October 2025.

3. **Company Supply Chain Policy**
To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, Tin Tech has developed a supply chain policy. The supply chain policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. The company is committed to addressing any Annex II risks if identified. The policy was reviewed and approved by senior management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is available on the company website at www.tintech.com.

4. **Company Management Systems**
   a. *Management Structure*
   Tin Tech follows through on its commitments in the supply chain policy and has developed an internal procedure for due diligence with the following aspects:
   - The General Manager will have the responsibility to manage the due diligence program and risk management design and implementation. As the due diligence program manager, responsibilities include coordination of various functions including purchasing, receiving, and quality, respective training of personnel within these functions, and maintenance of the due diligence program.
   - Tin Tech conducts due diligence training for all key staff as required by their job function. All new hires are trained during orientation and a refresher training on all standards is conducted for relevant employees every three years following the on-site audit. If there is an update to the program, additional training will be conducted as necessary. Training records are documented and retained.
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   b. *Internal Systems of Control*
   Tin Tech initially updated its due diligence management system to be aligned with the OECD Guidance and RMAP in June of 2019. The company communicated the updated supply chain policy and sourcing requirements to all relevant upstream suppliers in July of 2019 and continues to notify

of any changes or additions to its policies. The company has incorporated due diligence requirements into legally binding agreements with direct suppliers when applicable. Tin Tech visits 100% of its primary tin suppliers, and over 10% of its secondary material suppliers annually. Tin Tech utilizes its formalized grievance mechanism to control grievances from interested parties.

c. Record Keeping System
Tin Tech requires that all records relating to the due diligence program are maintained for at least 5 years. Records are stored digitally and/or hard copy.

5. Risk Identification

Tin Tech has a robust process to identify risks in the supply chain.

To address those risks referenced in Tin Tech's supply chain policy, a procedure to identify CAHRA (Conflict Affected and High-Risk Areas) has been developed. The procedure includes:
- The criteria used to define a CAHRA
- The resources used to identify a CAHRA, namely:
  - Heidelberg Conflict Barometer
  - Fragile State Index – Political Indicator 3
  - Worldwide Governance Indicators
  - The EU CAHRA list located at https://www.cahralist.net/cahras
  - U.S. Dodd-Frank Act
  - RMI Risk Map
  - Additional Industry groups including ITRI and ATTA.
- The annual frequency with which the determination is reviewed.

Tin Tech also follows a Know your Counterparty (KYC) process which includes supplier location mapping, financial, identification, and industry. The Due Diligence Manager reviews this information annually with the purchasing team and General Manager. Whenever red flags are identified, the Due Diligence Manager, purchasing team, and general manager will engage the supplier as required. During this reporting period, there were no red flags reported.

At the transaction level, because Tin Tech only processes secondary materials, generating process is determined for each material type, as well as originating country.

All information collected is reviewed by the Due Diligence Manager against CAHRA's, sanction lists, local laws, and internal sourcing requirements.

6. Supply Chain Review

On August 14, 2023 Tin Technology's Supply Chain was reviewed against the criteria outlined in the risk assessment factors. All current sources were determined to be low risk and no new risks were identified within the supply chain.

The annual review of Tin Technology's Responsible Souring Management System was reviewed at this time as well to ensure that all policies and procedures are up to date and being implemented as intended. No changes to the policies have been made at this time. All current documents pertaining to the Responsible Souring Procedures are available at www.TinTech.com/Resources.

Reported August 21, 2023