

Masan Tungsten Limited Liability Company (MTC)

Responsible Raw Material Procurement Policy

MTC is one of the leading global manufacturers of intermediate Tungsten chemicals including Sodium Tungstate, Ammonium Paratungstate, and Tungsten Oxides. We are included in the Conformant Tungsten Smelter List of the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI) under Smelter ID CID002543. We are committed to ensuring safety, health and protection of the environment and of the people who are engaged into manufacturing process and come into contact with our products. As responsible corporate citizens, we meet and are continually striving to exceed governmental, industrial and environmental standards worldwide.

MTC condemns any activities in connection with the unlawful exploitation of mineral resources, no matter where such activities take place. As part of this commitment, we have implemented a responsible and sustainable policy of only purchasing raw materials that are conflict-free and that always meet the requirements of the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas", 3rd Edition (the OECD Guidance¹). To this end, we conduct a 5-Step due diligence framework outlined in Annex I of the OECD Guidance.

We are committed to actively supporting our customers with their due diligence and disclosure requirements defined in section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act pertaining to "Conflict Minerals" and the regulations promulgated thereunder by the U.S. Securities and Exchange Commission, and EU Regulation 2017/821. Where appropriate, we support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI), including encouraging suppliers to disclose payments in accordance with the principles set forth under EITI.

MTC has implemented a Responsible Supply Chain Management (RSCM) system in line with the recommendations of the OECD Annex II and its supplement on Tin, Tantalum, and Tungsten. This system addresses the risks identified in the Annex II Model Supply Policy and promotes responsible and sustainable sourcing practices.

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognizing that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict, and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

1. Regarding serious abuses associated with the extraction, transport or trade of minerals
Under no circumstances will MTC accept, tolerate, profit from, contribute to, assist with, or facilitate the commissions by any party of:
 - i. any forms of torture, cruel, inhuman and degrading treatment,
 - ii. any forms of forced or compulsory labor, 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,
 - iii. the worst forms of child labor
 - iv. other gross human rights violations and abuses such as widespread sexual violence,
 - v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
2. Regarding direct or indirect support to non-state armed groups

MTC will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. “Direct or indirect support” to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i. Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain and/or,
 - ii. 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,
 - iii. Illegally tax or extort intermediaries, export companies or international traders.
3. Regarding public or private security forces
- i. MTC agree to eliminate direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders
 - ii. MTC recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade
 - iii. Where MTC or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for gross human rights abuses will not be hired.
 - iv. MTC will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.
 - v. MTC will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites
4. Regarding bribery and fraudulent misrepresentation of the origin of minerals
- MTC 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.
5. Regarding money laundering
- MTC will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.
6. Regarding the payment of taxes, fees and royalties due to governments
- MTC will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company’s position in the supply chain, MTC commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

Whereas the Responsible Supply Chain Management System (RSCM), through its control mechanisms, identifies any of the aforementioned actions, MTC shall establish and implement risk mitigation measures that include clearly defined and measurable timescales for achieving progressive improvement by suppliers. Suppliers shall be required to demonstrate measurable progress within such timelines through the implementation of corrective actions. Where mitigation efforts fail to achieve sufficient improvement within the defined timeframes, or where mitigation is not feasible due to the severity of the risk, MTC shall suspend or disengage from the supplier, either temporarily or permanently.

This Policy shall apply to Masan Tungsten Limited Liability Company (MTC), its suppliers and to all covered minerals relevant to MTC's activities. The Policy shall be reviewed periodically, at a minimum on an annual basis, and updated as necessary to reflect changes in regulatory requirements, operational conditions, or identified risks.

Through robust and certified procurement practices, MTC is committed to maintaining long-term, collaborative relationships with our suppliers, supporting continuous improvement and responsible sourcing. MTC ensures a safe, sustainable, and competitive supply of Tungsten products to our customers, in alignment with strong ethical, social, and environmental principles.

Thai Nguyen, January 2026



Michael Richard Lister Glover

Chief Executive Officer (General Director)