



Responsible Minerals Assurance Process (RMAP)
Public Due Diligence Report for Responsible Minerals Sourcing (Tin)

1. Company Information

Metallic Resources, Inc. (“MRI”) is an Ohio corporation founded in 1979. The company is a leading recycler of tin-based solder and solder dross with one smelting facility located at 2368 East Enterprise Parkway, Twinsburg, OH 44087. Our smelter identification number is CID001142. With respect to Tin, MRI only processes recycled or scrap materials.

2. RMAP Assessment Summary

Following an assessment conducted in March 2021 by SCS Global Services, MRI was accepted into the Risk-Based Assessment Program and is on a three-year assessment cycle. Prior to that, MRI had been audited for compliance with conflict-free standards annually dating back to 2015. The assessment summary report from the March 2021 assessment is available to the public through its website at www.metallicresources.com.

3. Company Supply Chain Policy

To avoid the use of conflict minerals, MRI maintains a Responsible Sourcing Policy which is available to the public through its website at www.metallicresources.com. MRI is aware of and actively supports the international efforts to investigate, monitor and mitigate activities that contribute to illegal armed groups, human rights violations, or financial wrongdoings in Tin supply chains. During MRI’s most recent assessment, our Responsible Sourcing Policy was reviewed and deemed 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 the risks identified in Annex II of the OECD Guidance and its geographic scope is global. MRI 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 (including suppliers, customers, employees, etc.) and is available on the company website.

4. Company Management System

a. Management Structure

MRI has established strong company management systems to support supply chain due diligence, and follows through on its commitments in the supply chain policy with an internal procedure for due diligence. The senior management structure assigned to oversee due diligence include a dedicated RMI Coordinator who, in conjunction with MRI’s President, are responsible to oversee the due diligence program and risk management design and implementation.

MRI’s President and RMI Coordinator work together with MRI’s Plant Manager and the other department supervisors (purchasing, production, shipping and receiving, etc.) to ensure each department follows up on their roles and responsibilities to implement the due diligence program to report any red flags and potential risks, gaps in the management system and opportunities for continuous improvement.

MRI conducts a due diligence management system training once a year for key staff from all relevant departments. All new hires are trained during orientation. If there is an update of the program, additional training will be conducted as necessary. MRI strives to continuously improve its supply chain due diligence efforts.

b. Internal Systems of Control

MRI has established and updated its due diligence management system to be aligned with the OECD Guidance and the Responsible Minerals Assurance Process. With respect to Tin, MRI only buys recycled or scrap material. Buyers are aware of the process the material is generated from before purchasing the material, and all material is reviewed upon receiving. Any material that is out of the ordinary will be evaluated and if found to be a risk will be returned to the customer. A mass balance assessment is completed through the process.

MRI utilizes RMI's grievance mechanism to collect information on grievances from interested parties at <http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/grievance-mechanism/>. Any grievances that MRI is made aware of will be handled on an individual basis to remedy the situation.

c. Record Keeping System

MRI requires that all records relating to the due diligence program be maintained at least for five years and that they are properly used and safely stored in MRI's database.

5. Risk Identification

To identify sourcing risks, MRI has established a procedure to identify conflict affected and high risks areas (CAHRAs). The procedure aims to identify the resources and criteria used to define a "conflict affected and high risk" area, and the frequency with which our determination is reviewed. Resources used in the CAHRA procedure include:

- U.S. Dodd-Frank Act
- European Union Regulation 2017/821 CAHRA List
- Heidelberg Conflict Barometer
- Fragile State Index and INFORM Index
- Worldwide Governance Indicators

Along with the CAHRA procedure, risks are identified by using a Know Your Counterparty (KYC) process that includes information concerning material origin, supplier legal status, ownership, business type, and potential risks. KYC data is reviewed and maintained by the RMI Coordinator.

MRI's operations may at times manufacture products for which conflict minerals are necessary to the functionality or production of those products. In this event, MRI will conduct a review of RMI conformant smelters and a good faith reasonable country of origin inquiry (RCOI) regarding the conflict minerals included in the products. If any OECD Annex II risks are identified MRI will evaluate each incident and take steps to remedy and reduce the risk. There have been no red flags identified during the reporting period.

6. Supply Chain Review / Risk Mitigation

MRI continues to review the supply chain against the criteria outlined in the Risk Identification. All current sources are determined to be low risk due to the material being secondary and from known sources, including secondary tin-containing material from Mexico. Mexico is a country identified as a low risk based on CAHRA criteria, and according to the RMAP standard, secondary material does not require determination of origin of risk analysis. MRI continues to ensure that the suppliers meet all KYC requirements, and that they do not result in any red flags being identified.

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