



10 June 2016

GTP Conflict-Free Tungsten Sourcing Policies and Measures

As one of the world's leading manufacturers of tungsten powders, GTP is committed to responsible and conflict-free sourcing of raw materials. Our 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 same commitments. GTP has implemented a supply management system based on our Supplier Policy and Code of Conduct to ensure that our tungsten raw material is sourced in a manner that does not support or benefit unlawful armed conflicts or contribute to serious human rights abuses or breaches in international humanitarian law. GTP fully supports the humanitarian goals of Section 1502 of the Dodd-Frank Act and is prepared to assist our customers in their efforts to comply with the conflict mineral rules adopted by the U.S. Securities and Exchange Commission.

GTP's conflict-free tungsten sourcing policies and measures include the following:

- Adhere to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Primarily source tungsten concentrate from 5 mines in Europe, Asia and the Americas with whom we have long-term supply agreements. GTP conducts regular site visits to all mines and requires full visibility on mining, processing and transportation of the material from the mine to GTP.
- Processing of tungsten containing secondary materials (i.e. scrap and recycled materials) which are conflict-free under the SEC rules.
- Implementation of the controls, practices and procedures contained in our Conflict-Free Tungsten Sourcing Manual, which includes *inter alia* supplier declarations, country of origin documentation/certificates and export documentation for all purchased tungsten concentrate, blacklist screening of suppliers, records searches, GTP's chemical "finger-printing," and internal review and approval procedures.
- Founding Member of Tungsten Industry – Conflict Minerals Council (TI-CMC)(www.ti-cmc.org) and commitment to making TI-CMC guidelines part of our tungsten sourcing strategy, culture and day-to-day operations. We require all our suppliers to adhere to the framework of the TI-CMC and we encourage all suppliers to join.
- Participation in an independent third party audit under the Conflict Free Sourcing Initiative (CFSI) jointly developed with the TI-CMC and the Electronic Industry Citizenship Coalition (EICC) (www.conflictreesmelter.org/cfshome.htm). GTP was last audited in early 2015 and continues to be compliant with the Conflict-Free Smelter Program Tungsten Protocol.

For several years, GTP maintained a policy of not sourcing from Africa out of concern that material could not be sourced responsibly from the region. However, after consultation with its customers and following several years of successful development of responsible sourcing measures, GTP, its customers and its suppliers have determined that sourcing can now be performed responsibly. GTP now considers sourcing from Africa, but its primary source of raw material will remain with the mines with whom we have long-term supply agreements and secondary raw materials.

Global Tungsten & Powders
Hawes Street
Towanda, PA 18848-0504
www.globaltungsten.com
Telephone (570) 268-5000
Fax (570) 268-5157