



Environmental, Social and Governance (ESG) Policy Statement

INTRODUCTION

Metal Tech, established in 1989, produces tungsten metal powder and tungsten-carbide powders used as industrial raw materials in the production of carbide bits, heavy metals, colors, ceramics and much more.

At Metal Tech we are committed to provide high quality products that will meet the needs and expectations of customers whilst recognizing the need to support a sustainable future by incorporating ESG considerations into all our areas of activity and influence.

As a tool to promote our sustainability approach, we at Metal Tech, have adopted this Environment, Social, and Governance policy that highlights our commitment within various focus areas, and provides a framework for achieving our sustainability objectives.

The policy is applicable to all our operations throughout our value chain and, accordingly, it extends beyond our manufacturing operations to our supply chain partners, and to all within our sphere of influence.

ENVIRONMENTAL STEWARDSHIP

1.1 Sustainable Resource Management

- **Efficient Use of Resources:**
 - We will implement processes that will maximize production efficiency, minimize waste and conserve raw materials.
- **Water management:**
 - We will measure and manage our water consumption to enable optimization of water usage efficiency.
- **Recycling and Reuse:**
 - We will promote the recycling and reuse of Tungsten and Tungsten Carbide materials within our operations and will encourage our customers to recycle and reuse, where possible.

1.2 Climate Change, Energy and Emissions

- **Climate change:**
 - We are committed to reducing greenhouse gas emissions, switching to renewable energy sources when possible and taking other actions, where feasible, to support the global efforts to mitigate climate change
- **Energy Efficiency:**
 - We will adopt energy-efficient technologies and practices to reduce energy consumption in our production processes.
 - We will carry out periodic comprehensive energy efficiency reviews to identify and implement energy saving measures
- **Carbon Footprint:**
 - We will measure and actively work to reduce our carbon footprint through initiatives such as use of renewable energy sources.

1.3 Waste Management

- **Waste Reduction:**
 - We will minimize waste generation through process optimization and waste prevention practices.
- **Proper Disposal:**
 - We will implement waste segregation practices to ensure all waste is disposed of responsibly and in compliance with environmental regulations.

SOCIAL RESPONSIBILITY

2.1 Ethical Sourcing and Conflict Minerals

- **Conflict-Free Minerals:**
 - We will ensure that all minerals, which may be contained in our products, will be acquired “Conflict- Free” with every due respect for human rights and in strict conformity with international trade standards. To pursue these standards we have resolved to adopt the practices specified in "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas".
 - We will source raw materials from suppliers who adhere to conflict-free standards, ensuring that our raw materials are not contributing to armed conflict or human rights abuses.
 - We require our suppliers to sign the Metal Tech Supplier Sustainability Declaration and, where relevant, to supply sourcing documentation concerning conflict minerals – CMRT (Conflict Minerals Reporting Template)
- **Supplier Due Diligence:**
 - With use of the RMI (Responsible Minerals Initiative) tools and extensive communication with our suppliers we will conduct due diligence on our supply chain to ensure compliance with conflict-free sourcing requirements, including regular assessments and audits.

2.2 Human Rights and Labour Practices

- **Fair Labour Practices:**
 - We will implement fair labour practices, ensuring that all employees are treated with dignity and respect
 - We will provide employees with fair wages and benefits that meet or exceed industry standards.
 - We will ensure a safe working environment through regular safety training, safety reviews and consultation and participation of workers. We will fully comply with all relevant health and safety regulations.
- **Career Management and Training:**
 - We will provide training and career management as required to enable a successful professional and psychosocial work environment.
- **Diversity and Inclusion:**
 - We will foster a diverse and inclusive workplace where all employees have equal opportunities for growth and development.
- **Forced and Child Labor:**
 - We will not be a part of or be complicit in forced labour or child labour in any form across our operations and supply chain

2.3 Engagement and communication

- **Stakeholder Engagement:**
 - We will maintain open and responsive communication with stakeholders, including employees, customers, suppliers, and other stakeholders, to address their concerns and incorporate their feedback into our practices.
- **Reporting**
 - We will maintain ESG reporting in frameworks such as *EcoVadis* and *IntegrityNext* for structured communication of information for stakeholders.
 - We maintain an updated CMRT (Conflict Minerals Reporting Template) available to all customers for verification of conflict minerals sourcing information.

GOVERNANCE

3.1 Corporate Governance

- **Ethical Business Practices:**
 - We will conduct our business with the highest ethical standards, adhering to all relevant laws and regulations, and promoting transparency and accountability.
- **Code of Ethics:**

We have adopted a code of ethics that all Employees must abide by to ensure:

 - Fairness in business including prevention of fraud, corruption and anticompetitive practices
 - Respect for human rights and due diligence to prevent complicity in the use of any form of forced or illegal labour, including child labour, especially with respect to conflict minerals sourcing
 - Diversity and respect towards others whilst valuing differing opinions and embracing diversity
- **ESG Oversight:**
 - We will periodically review the implementation and of our ESG policies and practices including the awareness and implementation of oversight practice as may be required.

3.2 Risk Management

- **Risk Assessment:**
 - We will regularly assess and mitigate risks associated with our operations, including environmental, social, and governance risks
 - We will maintain a risk register that is reviewed and updated periodically
 - We will develop and implement risk mitigation plans for identified significant risks
- **Information Security:**
 - We will ensure compliance with all information security regulations
 - We will adhere to data privacy regulations to protect the personal information of our employees, customers and partners
 - We will implement user access management to ensure that only authorized personnel have access to sensitive information and systems
 - We will conduct periodic reviews to ensure cyber security
- **Continuous Improvement:** We will continuously monitor and improve our ESG performance through regular reviews and the adoption of best practices.



3.3 Compliance and Reporting

- **Regulatory Compliance:**
 - We will ensure compliance with all relevant environmental, social, and governance regulations.
 - We will conduct periodic legal reviews to ensure compliance with new and existing regulations
 - We will provide ongoing training to employees on regulatory requirements
- **Transparency:**
 - Reporting on our ESG performance and progress to stakeholders will be carried out in a transparent, clear, accurate and complete manner

4. Implementation and Monitoring

4.1 Performance Metrics

- **Monitoring and Evaluation:**
 - We will develop and track key performance indicators (KPIs) related to our ESG goals and objectives.
- **Continuous Improvement:**
 - We will use performance data to identify areas for improvement and implement changes accordingly.

4.2 Stakeholder Feedback

- **Engagement:**
 - We will actively seek feedback from stakeholders on our performance and incorporate their input into our decision-making processes.

CONCLUSION

Through implementation of this policy, we aim to respond to today's environmental and societal challenges and better serve our community whilst delivering best possible performance and service to our customers.

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