



## MODERN SLAVERY STATEMENT 8 December 2021

### 1. REPORTING ENTITY

This Modern Slavery Statement is submitted by Global Advanced Metals Pty Ltd (ACN 139 987 465) (“GAM”) pursuant to the Australian Modern Slavery Act 2018 (the “Act”) for its financial year ending 30 June 2021. This report sets forth our controls and processes that address the risk of modern slavery, including those defined by the Act as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour (“Modern Slavery”) within our global supply chains across our business operations.

### 2. DESCRIPTION OF GAM’S STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

Founded in 2009, GAM is a privately held company incorporated in Australia with its registered office in Greenbushes, Western Australia. GAM is a leading vertically integrated provider of high performance, conflict-free tantalum metallurgical and powder products to customers around the world. For over 70 years, under current and past ownership, GAM has supplied many forms of tantalum and niobium metals and their alloys to various industries including electronics, aerospace, automotive, chemical manufacturing and defense. We also supply limited amounts of tin and tantalum ore concentrate to third party buyers from our Western Australia tantalum processing operation.

The GAM group company is comprised of over 300 employees, with mining operations and interests located in Greenbushes and Wodgina, Western Australia and tantalum processing plants located in Pennsylvania, USA and Aizu, Japan. Our corporate offices are located at these sites and in Wellesley Hills, MA USA and Tokyo, Japan.

GAM’s global supply chain includes third party suppliers of products and services that support these global mining, manufacturing, and chemical processing operations including, but not limited to, its critical tantalum feedstock raw materials (ore concentrate, oxide and scrap) along with other chemical processing materials, manufacturing and office equipment and supplies, and service providers (such as professional and financial, maintenance, repair, cleaning, transportation, waste, and security services). For more information about GAM, please visit our public website: [www.globaladvancedmetals.com](http://www.globaladvancedmetals.com).

### 3. DESCRIPTION OF THE RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS AND SUPPLY CHAINS OF GAM AND ANY ENTITIES IT OWNS OR CONTROLS

GAM’s global supply chain reaches across multiple countries and regions with varying perceived risks of Modern Slavery. GAM’s main raw material supply is tantalum, which in ore concentrate form, is supplied from various mining locations as well as internally from GAM’s mining interests located in Western Australia. Some of GAM’s supply of conflict-free tantalum from third parties comes from regions noted by the United Nations, the Organization for Economic Cooperation and Development (“OECD”) with perceived risks that include Modern Slavery. For example, certain countries in Central Africa such as the Democratic Republic of Congo (“DRC”) and Burundi are considered Conflict Affected and High Risk Areas (“CAHRAs”) where certain minerals, including tin, tungsten, tantalum and gold originate. The OECD and other government bodies have drawn links between ongoing conflict and human suffering in the DRC and illicit trade of minerals in that region.

#### 4. ACTIONS TAKEN BY GAM AND THE ENTITIES IT OWNS AND CONTROLS TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

To address the potential risks of Modern Slavery in our global operations and supply chains, including those identified above, we have policies and procedures in place to ensure ethical and responsible supply chain sources, for example:

- GAM's Supply Chain Policy addresses ethical and responsible sourcing of our tantalum supply, a copy of which can be found at <http://www.globaladvancedmetals.com/supply-chain-policy>.
- GAM's broader internal policies and procedures, including our Code of Conduct and Business Principles Policy (“**Code of Conduct**”) and Supplier Code of Conduct, each set forth compliance requirements with all applicable laws, including laws addressing and prohibiting Modern Slavery and encourage our employees, suppliers and stakeholders to report concerns of violation of these policies, including to GAM's Chief Compliance Officer, copies of which can be found at <https://www.globaladvancedmetals.com/wp-content/uploads/2020/11/GAM-Code-of-Conduct-and-Business-Principles-v113020.pdf> and <https://www.globaladvancedmetals.com/wp-content/uploads/2020/12/GAM-Supplier-Code-of-Conduct-v.12.02.20.pdf>, respectively.
- Our controls include the OECD 5-Steps Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs and the 14 points of its Annex II Model Supply Chain Policy that address serious abuses associated with the extraction, transport or trade of minerals (such as forced or compulsory labour, torture, cruel, inhuman and degrading treatment, gross human rights violations and the worst forms of child labour), direct or indirect support to non-state armed groups, public or private security forces, bribery and fraudulent misrepresentation of the origin of minerals, and payment of taxes, fees and royalties due to government. For example, we conduct due diligence screening for each new tantalum ore supplier, require their agreement to comply with our Supplier Code of Conduct, contractual commitments to our practices, various documentation to evidence compliance and additional steps are undertaken for tantalum ore suppliers that source tantalum ore from CAHRAs including mine site visits and that they have accepted member status of the ITRI Tin Supply Chain initiative (“**iTSCi**”) and/or the Better Sourcing Program (“**BSP**”) or provide similar evidence of due diligence that is commensurate with the level of risk exposure.
- In support of GAM's efforts to help eliminate unlawful and unethical minerals trade, GAM is a member of various organizations including the Responsible Minerals Initiative (“**RMI**”) and its predecessor-organizations and supports the Responsible Minerals Assurance Process (“**RMAP**”) which is committed to the promotion of responsible supply chains for all minerals, including tantalum. We cooperate with these stakeholders and OECD, the iTSCi program, and the Public Private Alliance for Responsible Minerals Trade (“**PPA**”) to establish credible effective processes to eliminate non-ethical tantalum mining and trade through enhanced due diligence, and allow the continuation of legitimate mining activities in CAHRAs.
- GAM is also subject to other certifications and conflict-free minerals requirements from its customers and member organizations that include controls aimed at addressing Modern Slavery.

GAM's transactions and contracts with its suppliers are conducted with the expectation of compliance with applicable laws and, where applicable, our Supplier Code of Conduct among the other controls noted above.

#### 5. ASSESSMENT OF THE EFFECTIVENESS OF THESE ACTIONS

In addition to our established corporate processes and controls that address regulatory compliance such as financial, safety and health and enterprise risk monitoring, the actions and risk controls referenced above that address Modern Slavery risks are regularly assessed for effectiveness. For example:

- Since the third party administered RMAP audit program was first developed in 2010, our manufacturing sites in Boyertown, Pennsylvania, U.S.A. and Aizu Wakamatsu, Japan have annually passed and been declared conformant to the RMAP audit Standard for conflict-free tantalum supply.

- Our processes include re-screening of active tantalum ore concentrate suppliers through our due diligence screening process to ensure that any supplier with mining activities in CAHRAs or elsewhere adhere to OECD conformant upstream mechanisms (i.e. iTSCi or BSP) and to conduct tantalum mine site visits from time to time.
- We maintain communications and frequently meet with our ore concentrate suppliers.
- We monitor on-going reporting from organizations referenced above (e.g. iTSCi) regarding membership status of registered tantalum ore concentrate suppliers and take action where appropriate.
- We participate in on-going collaboration with RMI, OECD, and PPA among others to monitor relevant developments and opportunities for continuous improvement in supply chain due diligence processes.

These internal controls are monitored for compliance and continuous improvement within GAM by functions including GAM's Director of Sourcing and Corporate Sustainability, the procurement team, the Chief Compliance Officer, the Executive Committee and with the Board of Directors and relevant Board Committee oversight.

## **6. DESCRIPTION OF THE PROCESS OF CONSULTATION WITH ENTITIES GAM OWNS OR CONTROLS**

GAM's internal policies and procedures comprise systems and controls to prevent risks of Modern Slavery in our operations. GAM's Values Statement and Code of Conduct promote a culture of integrity with guiding principles and expectations for all employees when interacting internally and with external parties. In addition to our training and awareness measures, our Code of Conduct encourages our employees, suppliers and stakeholders to raise any concerns, including concerns of human rights violations in our operations or supply chain, without fear of retaliation. Our reporting processes include governance oversight and reporting lines to our Chief Compliance Officer and, as appropriate, other officers, and to the Audit and Risk Management committee.

This Modern Slavery Statement was approved by the GAM Board of Directors on 8 December 2021

  
\_\_\_\_\_  
Andrew O'Donovan  
CEO and Managing Director

  
\_\_\_\_\_  
Date