

Responsible Minerals Sourcing Policy

This policy applies to the selection and retention of all Evans Tool & Die direct (or "tier one") suppliers that provide materials that contain tin, tantalum, tungsten, gold and/or cobalt.

Evans takes a holistic approach to the responsible sourcing of minerals. Evans seeks to avoid sourcing minerals that contribute to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas ("CAHRAs"), including the Democratic Republic of the Congo ("DRC") and DRC-adjoining countries. Evans also seeks to avoid harming communities in CAHRAs through de facto embargoes of minerals sourced from those areas. Armed groups operating in the eastern DRC have engaged in conflict and severe human rights abuses, fueled through proceeds from the mining or trade of so-called "conflict minerals" or 3TGs (tin, tantalum, tungsten and gold). These atrocities led to the creation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, built on the framework of the UN Guiding Principles on Business and Human Rights. Legal requirements have followed, requiring certain companies to disclose their due diligence consistent with the OECD Guidance, mitigating the risk that the 3TGs they purchase may directly or indirectly fund conflict in the DRC, adjoining countries, or other high-risk areas of the world. At the same time, companies are expected to source responsibly from these areas to avoid a de facto embargo, which can have significant adverse impacts or unintended consequences for artisanal miners and their families whose livelihood depends on the mining industry. Similar concerns have arisen surrounding the social and environmental impacts of cobalt extraction, including child labor and unsafe working conditions in artisanal cobalt mining in the DRC. The Responsible Business Initiative (RMI) added cobalt as a dedicated focus area in 2017. RMI is working to assist companies in exercising due diligence over cobalt supply chains in accordance with the OECD Due Diligence Guidance. Evans deplores the violence and inhumane treatment in the DRC, adjoining countries and other parts of the world. By adopting this Policy and collaborating with our customers and suppliers, Evans is working with others to promote responsible business practices and foster peace and prosperity, which is consistent with Evans values.

Evans is committed to responsible sourcing of minerals, including 3TG and cobalt, so as not to support conflict or human rights abuses in the DRC region or other CAHRAS, while avoiding de facto embargoes.

This position is consistent with Evans respect for human rights in our own operations and our supply chains.

Evans suppliers are REQUIRED to:

- Per Evans' relevant purchase order terms & conditions; Supply materials to Evans that are "Conflict-Free," meaning minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo, adjoining countries or any other CAHRAs as determined by regulatory bodies and as applied by RMI.
- We expect our suppliers to be transparent and responsibly source from the DRC, adjoining countries, and CAHRAs, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems to identify, prevent, mitigate and, where appropriate, remediate risks associated with minerals, including 3TGs and cobalt, as well as require their suppliers to adopt similar policies and practices. Evans expects suppliers to cooperate with Evans in evaluating compliance with these requirements.
- Provide Evans information on the presence of requested minerals, including 3TGs and cobalt in their products and data on the smelters and refiners in their respective supply chains, consistent with the industry standard for Supply Chain Transparency provided in the Conflict Mineral Reporting Template (CMRT) or Cobalt Reporting Template (CRT) as developed by RMI.
- Procure, directly or indirectly, from smelters and refiners validated under the Responsible Minerals Assurance Process (RMAP) of RMI or other recognized third-party audit / validation programs (for suppliers whose sourcing originates from the DRC, adjoining countries or other CAHRAS).
- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation or non-conformance with Evans' policy.
- Collaborate with others on cross-industry efforts, such as with RMI, to support responsible minerals sourcing, including on-going education and training.

Related Information:

OECD Due Diligence Guidance-

The five-step framework

- Step 1: Establish strong company management systems
- Step 2: Identify and assess risks in the supply chain
- <u>Step 3</u>: Design and implement a strategy to respond to identified risks
- Step 4: Carry out independent thirdparty audit of supply chain due diligence
- <u>Step 5:</u> Report annually on supply chain due diligence

Templates and more information can be found using the link below:

https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/