

# SUPPLY CHAINS THAT HELP BUILD A BETTER WORLD

As a global company, we do business with over 2,000 suppliers around the world who are expected to follow our Supplier Code of Conduct. Our dealings with our supply base are conducted with all relevant laws and regulations. We continuously monitor our suppliers against a consolidated database of denied and/or restricted parties. If a supplier appears in the database, they are thoroughly vetted before moving forward with any further business decisions.



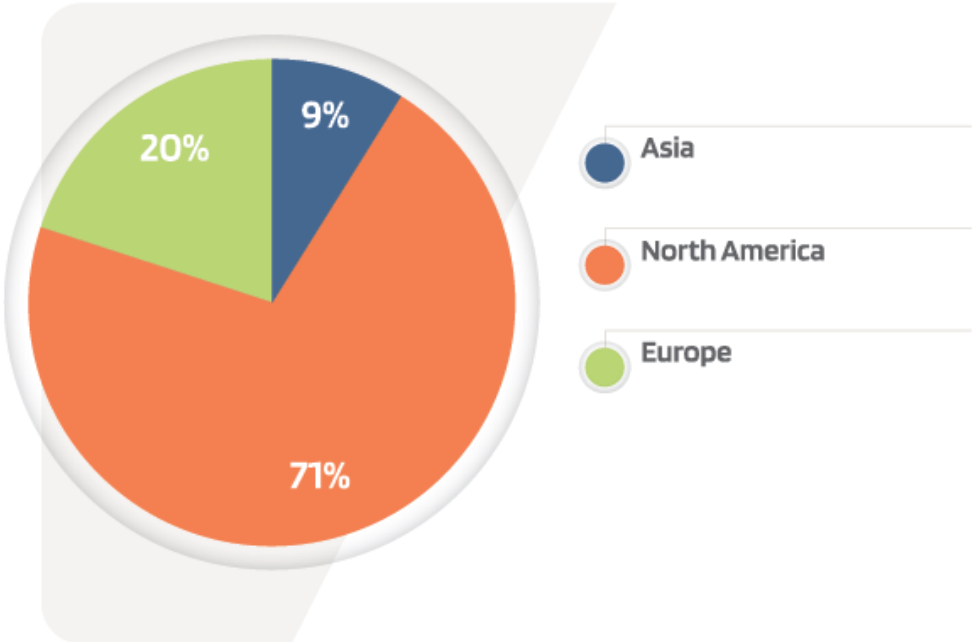
We engage  
100% of our  
key suppliers  
on  
sustainability

Prior to engaging with a new supplier, we require those organizations to agree to our Supplier Code of Conduct, acknowledge the Countering America's Adversaries Through Sanctions Act (CAATSA) declaration and screen them against the consolidated database of denied and/or restricted parties. Additionally, we conduct due diligence with our relevant suppliers consistent with the regulatory requirements, the guidance from Organization of Economic Co-operation and Development (OECD) and the Responsible Business

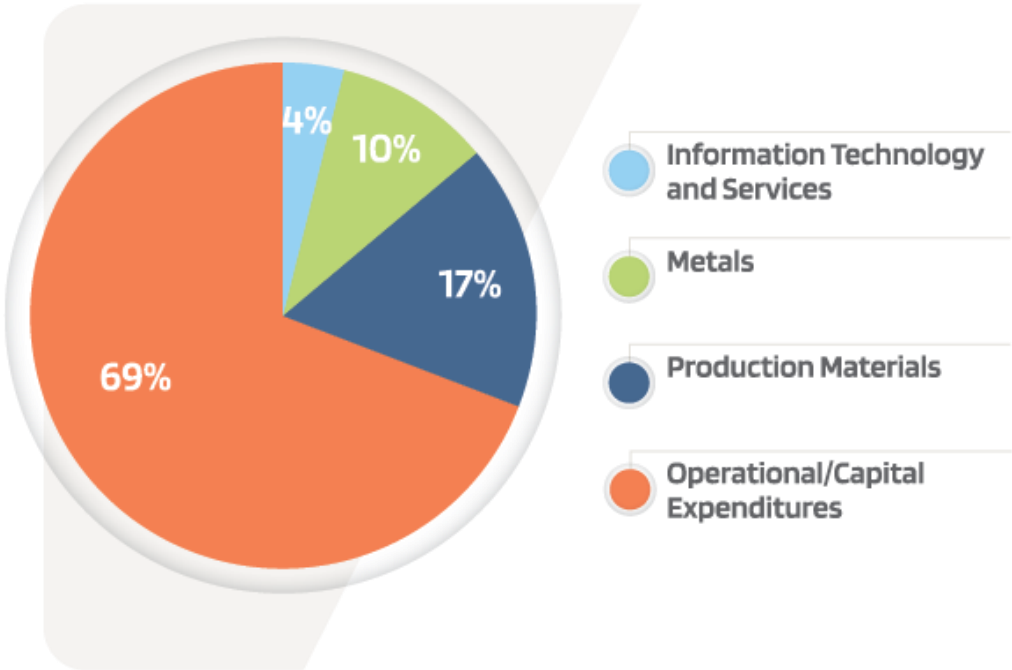
Alliance's Responsible Minerals Assurance Process (RMAP). This is to confirm compliance with regulatory requirements as well assure that materials such as tin, tantalum, tungsten, cobalt and gold are sourced from smelters that are not involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings. For additional information, please visit our Responsible Minerals Sourcing Policy page.

Materion's Procurement and Supply Chain management function works together with our supply base to ensure that they can effectively support our global businesses. We strive to do this through continuous improvement, effective cost management and risk management.

### 2022 Spend by Region



### 2022 Suppliers by Category



# RESPONSIBLE MINERALS SOURCING

Materion is committed to responsible sourcing of minerals and ensuring that our products do not incorporate conflict minerals, which are minerals smelted into tin, tantalum, tungsten and gold sourced from entities that directly or indirectly finance or support conflict and other rights violations.



In support of this commitment, Materion has developed a Responsible Minerals Management System that includes specific roles and responsibilities, with executive-level oversight to ensure effective implementation. More details on our management system and related activities can be found in the links below.

Materion is a member of the Responsible Minerals Initiative (RMI) and has also successfully undergone due diligence audits by RMI following the Responsible Minerals

Assurance Process (RMAP) at both of Materion's operated smelter/refiner facilities in Buffalo (NY) for gold and Newton (MA) for tantalum. The RMAP due diligence audit program is a multi-stakeholder process led and supported by a cross section of industries, including Electronics, Aerospace, Automotive, as well as governments, and other stakeholders. Downstream companies rely on the conformance of smelters and resultant Conformant products to comply with regulatory requirements under US Dodd-Frank 1502, EU 2017/821, and other regulations and requirements.

## RESPONSIBLE MINERALS SOURCING POLICY

As a global leader in high performance engineered materials and metals, Materion Corporation (Materion) is aware of the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas (CAHRAs) and recognizes that we have the responsibility to respect human rights and not contribute to conflict or other forms of corruption. This is in accordance with U.N. resolutions, Section 1502 of the Dodd Frank Act and EU Regulation 2017/871. Materion will only purchase materials such as tin, tantalum, tungsten, cobalt and gold from sources that are not involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of the Organization of Economic Co-operation and Development Due

Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas (OECD Guidance) and listed here:

- Serious abuses associated with the extraction, transport or trade of minerals:
- Any forms of torture, cruel, inhuman and degrading treatment.
  - Any forms of forced or compulsory labor.
  - The worst forms of child labor.
  - Other gross human rights violations and abuses such as widespread sexual violence.
  - War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.
- Direct or indirect support to non-state armed groups.
- Direct or indirect support to public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of minerals.
  - Money laundering.
  - Non-payment of taxes, fees and royalties to governments.

In support of the above, all relevant Materion personnel are directed to follow and be trained on procedures to implement a conflict minerals due diligence system designed to:

- Exercise due diligence with relevant suppliers consistent with the OECD Guidance and the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) and encourage our suppliers to do the same.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm materials in our supply chain do not contribute to illegal armed groups, human rights violations, or financial wrongdoings as defined in Annex II of OECD Guidance.
- Establish long-term relationships with our immediate suppliers and counterparties.
- Support and build capacities of suppliers and counterparties to improve performance and conform to this supply chain policy.
- Suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.
- Immediately discontinue engagement with suppliers who pose a reasonable risk to be causing severe human rights abuses.

## Supply Chain and Responsible Minerals Sourcing



- Undergo an annual RMI RMAP assessment at applicable facilities to verify our conformance status as well as identify opportunities to continually improve our conflict minerals due diligence management system.
- Commit to transparency in the implementation of this policy by making available reports on our progress to our customers, relevant stakeholders and the public (as required).
- Support the implementation of the principles and criteria of the Extractive Industry Transparency Initiative (EITI).

Any concerns about our policy or due diligence system should be reported to Responsible Minerals Initiative through its grievance mechanism that can be accessed [here](#).

If you have specific questions or would like additional information, please contact Ted Knudson, Director, Regulatory Affairs and Product Stewardship at +1.216.383.4040 or by e-mail at [theodore.knudson@materion.com](mailto:theodore.knudson@materion.com).

March 24, 2023

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