



MATERION CORPORATION ANNUAL DUE DILIGENCE REPORT 2023 - 2024

1. COMPANY INFORMATION

Materion Corporation (Materion) is an advanced materials supplier. Through its subsidiaries in the [Materion Electronic Materials](#) business, Materion operates a gold refining facility located at 2978 Main Street, Buffalo, NY 14214 and a tantalum refining facility located at 45 Industrial Place, Newton, MA 02461.

At the Buffalo facility, the only conflict mineral it refines is gold with the vast majority of it being recycled gold. Any mined gold received at Materion is first refined at other refiners who have been audited conformant with the Responsible Minerals Assurance Process (RMAP) by the Responsible Minerals Initiative (RMI). Materion does not source or refine doré or unrefined mined gold.

At the Newton facility, the only conflict mineral it refines is tantalum with the vast majority of it being recycled tantalum. Any mined tantalum received at Materion is first refined at other refiners who have been audited conformant with RMAP by RMI. Materion does not source or refine unrefined mined tantalum.

Materion collects parts, equipment or materials to be refined at the Buffalo and Newton facilities from locations in the U.S., Asia and Europe that then send the materials or parts to the Buffalo or Newton facility for refining, as needed.

The RMI Smelter CID number for the gold refining facility in Buffalo, NY is CID001113. The RMI Smelter CID number for the tantalum refining operation in Newton, MA is CID002548

This report reflects the current Responsible Minerals Sourcing Management System that was implemented in 2024.

2. RMAP ASSESSMENT SUMMARY

The Buffalo facility underwent a RMI RMAP assessment on March 5 -7, 2024. The assessment was valid for one year. The assessment period was from July 3, 2021 through February 2, 2024. The assessment was conducted by an RMI appointed Sourcing Audit Firm, Arche Advisors. The facility is in the process of working with RMI to complete corrective actions to address findings from the assessment and receive a RMAP Conformant Letter from RMI.

The Assessment Summary Report will be available on the RMI Conformant Smelter/Refiner page upon completion of all corrective actions. The previous

assessment report is currently available on the RMI website at the following URL:
<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Materion%20Public%20Report.pdf>.

The Newton facility underwent a RMI RMAP assessment on December 16 – 19, 2024. The assessment is valid for one year. The assessment period was from October 1, 2023 to November 1, 2024. The assessment was conducted by Arche Advisors, a RMI appointed Sourcing Audit Firm.

During the risk assessment process Newton identified several Red flags related to the countries in which the materials traveled through from the supplier to the Newton facility. The following countries were identified as red flags for this reason: China and Kazakhstan. Red flags related to transit routing are mitigated by reviewing shipping records for any discrepancies. None were identified during this assessment period.

The assessment summary report will be available on the RMI Conformant Smelter/Refiner page upon completion of all corrective actions. The previous assessment report is currently available on the RMI website at the following URL:
<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Materion%20Newton%20Public%20Report.pdf>.

3. COMPANY SUPPLY CHAIN POLICY

To avoid the use of conflict minerals, which directly or indirectly finance or benefit armed groups and/or involve other serious human right abuses in high-risk and conflict-affected regions, Materion has updated its Responsible Minerals Sourcing Policy. The policy is fully aligned with the third edition of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance). It covers all of the risks identified in Annex II of the OECD Guidance and its geographic scope is global. Materion is committed to addressing any Annex II risks if identified. The policy was reviewed and approved by senior management, which committed to support its implementation. The policy has been widely disseminated to relevant stakeholders (suppliers, customers, employees etc.) and is available on Materion website [here](#). The policy is reviewed annually by RMAP auditors.

4. RESPONSIBLE MINERALS SOURCING MANAGEMENT SYSTEM

Management Structure

The Responsible Minerals Sourcing Management System is managed through three committees, each overseeing and managing system functions related to their business units, who collectively comprise the Responsible Minerals Management Team. The committees work together and continuously update one another to ensure the overall system works as intended and is effective across all relevant business units.

Individuals are responsible for ensuring each department follows up on their roles and responsibilities to implement the Responsible Minerals Sourcing Management System and report any red flags and potential risks identified. Three key positions responsible for implementing the Responsible Minerals Sourcing Management System are:

- Director, Regulatory Affairs and Product Stewardship – Mayfield Heights: responsible for the corporate-wide oversight and due diligence of minerals that are not refined by Materion.
- Manager, Inventory Control of Precious Metals – Buffalo: responsible for implementation of all activities related to the Buffalo refining facility and process.
- Logistics Manager - Newton: responsible for implementation of the Responsible Minerals Sourcing Management System and the Newton refining facility and process.

Materion conducts Responsible Minerals Sourcing Management System training once a year for key staff from all relevant departments required in Responsible Minerals Sourcing Management System. If there is an update of the system, Materion conducts additional training as necessary.

Internal Systems of Control

Materion maintains its Responsible Minerals Sourcing Management System to be aligned with the OECD Guidance and RMAP requirements. This includes, as necessary, updating the Responsible Minerals Sourcing Policy; communicating this policy to all suppliers of conflict minerals; incorporating responsible sourcing requirements into legally binding agreements with direct suppliers; and conducting due diligence of each supplier of conflict minerals and all gold and tantalum material destined for refining.

Materion utilizes Ethicspoint to allow any interested party to voice concerns regarding the circumstances of mineral extraction, trade, handling and export of 3TG materials. Grievances reported via Materion@Ethicspoint.com are reviewed by the Senior Responsible Official and RMI Program Manager to determine if further action is required. Materion has a strict non-retaliation policy, so you will never be retaliated against or punished in any way for reporting your concerns in good faith.

Record Keeping System

Materion requires that all records relating to the Responsible Minerals Sourcing Management System are maintained for a minimum of five years.

5. RISK IDENTIFICATION

Even though the majority of the gold and tantalum obtained by Materion originates from recycled gold and tantalum from Materion products originally supplied to and then

returned by our customers, posing a low risk of harm, Materion has a suite of procedures to identify risks in the supply chain that aligns with RMAP and OECD expectations. These procedures include:

- Procedures to Identify Material-related Risks and Red Flags. This procedure includes identifying the type of material, its origin and transportation routes, including those from or passing through CAHRAs; comparing relevant information against expectations to identify any red flags or needed enhanced due diligence for high risk materials.
- Procedure to Identify CAHRAs. Materion uses publically available resources, such as the EU CAHRA list and RMI's Global Risk Map Tool, to identify material that originate from or have been transported via conflict regions. This review is performed annually.
- Procedure to Know Your Counterparty. Materion requests KYC information from each supplying counterparty using a standard form. This information is evaluated for red flags, using resources such as government sanctions lists. Any red flags will result in additional due diligence before approving the supplier.
- Procedure to Identify Supply Chain Risks. High risk sources are evaluated for supply chain risks using supply chain mapping. Risk factors include transaction value and location, type of material and supplying counterparty, and the presence of any unusual circumstances.

6. RISK ASSESSMENT and MITIGATION

Materion has established a procedure to identify, manage or mitigate risks that centers on risks identified in OECD Guidance Annex II and aligns with RMAP OECD expectations. The risk assessment compares factual circumstances against OECD identified risks. Information used in assessing risk is compiled through various channels, included KYC documentation, on-site visits, independent audit reports and NGO or other stakeholder reports. During the reporting period, several of the suppliers of gold and tantalum are in areas determined to be high risk during our risk identification process. Materion has developed and implemented a procedure to conduct enhanced due diligence for these suppliers. This procedure includes the following Risk mitigation methodologies:

- Initially, Materion may continue trade throughout the course of measurable risk management efforts. This may include collecting documentation for long-standing suppliers.
- Materion may temporarily suspending trade while pursuing ongoing mitigation efforts. This may happen where specific documentation is not available from a supplier within a specified timeframe.
- Finally, Materion may disengage with a supplier in cases where mitigation appears not feasible or unacceptable. This may occur where the supplier will not provide documentation or the supplier loses certification status (RMI RMAP).



Our enhanced due diligence performed during the reporting period included the performance of on-site assessments at three higher risk suppliers. These on-site assessments utilize standardized methodology to evaluate each supplier.

This methodology includes Materion staff performing an on-site facility tour and interviews with responsible staff of the supplier. Information is gathered pertaining to business activities conducted at the site, supply chain, anti-money laundering procedures, responsible sourcing of materials, working conditions, and site security. Each topic is evaluated to determine the presence of any risks. These are compared to Materion's expectations and actual conditions observed at the site.

All three assessments confirmed that materials supplied to Materion are exclusively spent targets being returned for reclamation. These returned spent targets are products originating from Materion. Observations made during the on-the-ground assessments are consistent with Materion's understanding of the source of these materials. Our enhanced due diligence activities, including the on-site assessments, did not identify any OECD Guidance Annex II risks or any instances of financing of terrorism.

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