

A.L.M.T. Corp. (hereinafter referred to as “the company”) does not engage in direct or indirect support of any inhuman act relative to mining, trade, handling and export of conflict minerals that originate in the conflict areas (the Democratic Republic of the Congo and its nine neighboring countries).

Procurement of raw mineral materials is subject to risk management and if any of such materials is found to be mined in a conflict area through an inhuman act, trade of the material will be immediately suspended.

1. Management System and Responsibility

Among the four conflict minerals, the company smelts tungsten alone. Furthermore, all raw tungsten materials are procured by our Material Department and then supplied to a smelter under the control of the company. No smelter is to procure any raw tungsten material on his/her own.

In order to promote conflict mineral management, the company appoints a compliance officer who is tasked with organizing related sections and departments to establish a management system.

2 . Criteria for Raw Material Procurement from High Risk Countries

The company determines that any procurement of raw tungsten material from the conflict areas (the Democratic Republic of the Congo and its nine neighboring countries) is highly risky.

3 . Due Diligence of Raw Material Seller

All sellers of raw tungsten material are subject to due diligence and risk assessment. If the officer of Conflict Minerals Control determines that a certain raw material is highly risky and is found to be associated with any armed group in the conflict area, the purchase of such material is suspended.

4 . Monitoring of Purchased Raw Material

Any raw material purchased by the company is supplied to our smelters. The smelters physically check the material for all accepted lots, compare it with the information presented by the seller which is then provided by the Material Department beforehand and finally report the result of the comparison to the Head Office.

5 . Education

The compliance officer provides opportunities of education and training to the Material Department, our smelters and to other related sections and departments at any point in time and depending on the situation where such education and training are considered to be necessary.

6 . Audit by Third Party Organization

For the purpose of verifying the suitability of the control system and its enforcement, the company undergoes an audit conducted by an independent third-party organization on a periodic basis.

7 . Retention of Records

The administrative officer defines the types of documents that need to be retained regarding the conflict mineral management and decides the limit of retention time for the purpose of control.

- Compliance Officer

Appointed by Compliance Committee

- Person Subject to Control

Administrative officer in Material Department: General Manager of the Department

Administrative officer in smelters: Director of Powder Alloy Division

- Control Item

Due diligence of raw material recipients

Business procedures for comparison of records between receipt and shipping

Retention of Records

Established on November 28, 2014

Revised on April 1, 2017

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