

## RMAP Due Diligence Report

### 1. COMPANY INFORMATION

a.	<b>Company Name</b>	:	Metallurgical Products India Pvt. Ltd.
b.	<b>Plant Location</b>	:	T-27, MIDC-Taloja Industrial Area, District Raigad – 410208, Maharashtra, India
c.	<b>3TG Material Processed</b>	:	Tantalum
d.	<b>CID Number</b>	:	CID001163
e.	<b>Report Period</b>	:	November 30, 2018 – December 11, 2019
f.	<b>RMI Compliance Status</b>	:	Compliant

### 2. RMAP ASSESSMENT SUMMARY

a.	<b>Last RMAP Assessment</b>	:	November 28-29, 2018
b.	<b>Assessment Period</b>	:	October 05, 2017 - November 29, 2018
c.	<b>Assessment By</b>	:	RMI Audit Review Committee
d.	<b>Assessment Summary URL</b>	:	<a href="http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/smelter-refiner-lists/tantalum-smelters-list/conformant-tantalum-smelters/">http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/smelter-refiner-lists/tantalum-smelters-list/conformant-tantalum-smelters/</a>

### 3. COMPANY SUPPLY CHAIN POLICY

Metallurgical Products India Pvt. Ltd. (MPIL) is committed to sourcing all our Tantalum mineral raw materials (ie. Tantalite, Columbite and other Tantalum-bearing minerals) in an ethical and responsible manner. We strongly support the RMI (Responsible Minerals Initiative) Program founded by members of the RBA (Responsible Business Alliance) and GeSI (Global e-Sustainability Initiative) and conduct our business in accordance with its principles. Our Tantalum minerals' sourcing practices conform to the applicable RMAP (Responsible Minerals Assurance Process) Standard for Tantalum. [Full policy available at [www.mpil.co.in](http://www.mpil.co.in)]

#### 4. COMPANY MANAGEMENT SYSTEMS

a.	<b>Management Structure</b>	:	<p>RMAP-Team comprising Senior Management set up for:</p> <ul style="list-style-type: none"> <li>i. Compliance with the latest applicable RMAP Standard for Tantalum.</li> <li>ii. Conducting in-house training.</li> <li>iii. Continual improvement of internal systems &amp; processes.</li> <li>iv. Grievance Redressal and addressing any reported incident with regard to our Tantalum Minerals Supply Chain Policy.</li> </ul>
b.	<b>Internal Systems</b>	:	<p>RMAP Procedures &amp; Processes Manual</p> <ul style="list-style-type: none"> <li>i. Supply Chain Policy communicated to Suppliers</li> <li>ii. Sources of supply evaluated in-depth</li> <li>iii. Supplier KYC conducted</li> <li>iv. Supplier operations visited</li> <li>v. Origin &amp; traceability documents obtained</li> <li>vi. Incident Reporting and Grievance Redressal Mechanism in place</li> </ul>
c.	<b>Training</b>	:	Two or more per year
d.	<b>Record Keeping</b>	:	Five year records to be preserved



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## 5. RISK IDENTIFICATION

<p>Metallurgical Products India Pvt. Ltd. has established and implemented a process to identify supply chain risks, that includes referring to public resources and in most cases, visits to suppliers' operation sites. Our Tantalum minerals' sourcing practices lay emphasis on engaging closely with our suppliers for a sound understanding of the supply chain and accurate assessment / mitigation of risks. As the nature and regions of conflict are ever-changing, we would follow a practice of annual reviews.</p>	
<p><b>a. Identification of CAHRAs</b></p>	<p>: Refer to <a href="http://www.crisisgroup.org">www.crisisgroup.org</a>, <a href="http://www.hrw.org">www.hrw.org</a>, <a href="http://www.knowyourcountry.com">www.knowyourcountry.com</a>, as well as country-specific government and industry websites.</p> <ul style="list-style-type: none"> <li>i. Absence of Government controls / formalized laws and regulatory structure for the Tantalum mining industry in the Country.</li> <li>ii. Absence of Government Controls / formalized laws and regulatory structure for Corporate Governance in the Country.</li> <li>iii. Presence of illegal armed conflicts / widespread human rights abuses having ties to the Tantalum mining industry in the Country.</li> <li>iv. Control / influence of any illegal, armed militia or self-proclaimed authoritarian group on any part of the Tantalum mining industry in the Country which challenges the authority of the Government / Judiciary of that Country.</li> </ul>
<p><b>b. Know Your Counterpart</b></p>	<p>: Supplier corporate information and business permissions reviewed and EU Sanction / OFAC Lists referred as per our Know Your Supplier Policy</p>
<p><b>c. Origin &amp; Traceability</b></p>	<p>: Origin and transportation documents reviewed consignment-wise as per the RMAP Standard for Tantalum</p>
<p><b>d. Identification of Red Flags</b></p>	<p>No Red Flags were identified during this reporting period. The following points were taken into consideration:</p> <ul style="list-style-type: none"> <li>i. Plausibility</li> <li>ii. Common border with a CAHRA</li> <li>iii. Transportation via a CAHRA</li> <li>iv. Third Party / Cash payments</li> </ul>