

# Sustainable Procurement Framework for Tungsten

## Purpose and Commitment

Umicore is committed to responsible and sustainable sourcing of tungsten and to conducting its business in a manner that respects human rights, supports ethical business practices, and minimizes adverse environmental and social impacts.

Tungsten is recognized as a conflict mineral under the EU Conflict Minerals Regulation (EU) 2017/821. Umicore acknowledges that sourcing minerals from conflict-affected and high-risk areas may present heightened risks, including the potential financing of armed groups, human rights abuses, corruption, and environmental harm. Through this Sustainable Procurement Framework for Tungsten, Umicore seeks to prevent, identify, and address such risks in its supply chain.

This Framework sets out Umicore's public commitments, principles, and high-level approach to responsible tungsten sourcing. It is aligned with internationally recognized standards, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

## Scope

This Framework applies to Umicore's upstream tungsten supply chain, including suppliers involved in mining, trading, processing, refining and recycling of tungsten materials, where Umicore acts as a Union importer of minerals and metals within the context of the EU Conflict Minerals Regulation (EU) 2017/821. It covers both primary and recycled tungsten and applies to new and existing business relationships.

The Framework complements Umicore's broader policies and standards on responsible sourcing, business ethics, sustainability, and compliance, including the Umicore Code of Conduct, the Umicore Global Sustainable Sourcing Policy, and the policy on Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas. To give effect to this policy, internal guidelines, instructions and templates have been developed to support supplier due diligence processes.

Umicore's approach to sustainable procurement of tungsten is guided by, and consistent with:

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its related supplements
- Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas ("EU Conflict Minerals Regulation").

# Core Principles

Umicore's Sustainable Procurement Framework for Tungsten is built on the following principles:

## **Risk-Based Due Diligence**

Umicore applies a risk-based approach to its tungsten supply chain. This means that the nature and depth of due diligence activities are proportionate to the level of risk.

When not all risks can be addressed immediately, Umicore prioritizes the most severe and likely risks, with particular attention to those impacts which Umicore may cause, contribute to, or be directly linked to.

## **Respect for Human Rights**

Umicore expects its suppliers to respect internationally recognized human rights and to operate in compliance with Umicore's Human Rights Policy. Within the context of this Framework, particular attention is paid to risks related to serious human rights abuses, including forced labour, child labour, and inhumane treatment, as well as risks linked to conflict and security forces.

## **Ethical Business Conduct**

Umicore does not tolerate bribery, corruption, money laundering, fraud, or the financing of armed groups or criminal activities. Suppliers are expected to operate in compliance with applicable laws and to uphold high standards of business integrity.

## **Transparency and Traceability**

Umicore seeks to promote transparency and traceability in its tungsten supply chain. Suppliers are expected to provide reliable information on the origin of materials, supply chain actors, and relevant transactions, in line with applicable standards and contractual requirements.

## **Continuous Improvement and Engagement**

Umicore recognizes that responsible sourcing is an ongoing process. Where risks or gaps are identified, Umicore seeks to engage constructively with suppliers to promote improvement, build capacity, and mitigate adverse impacts, where feasible.

# Identification and Assessment of Risks

Umicore seeks to identify and assess actual and potential adverse impacts associated with its tungsten supply chain.

In line with OECD Guidance, Umicore will not tolerate nor profit from, contribute to, assist in, or want to be linked to any of the following violations:

- Any form of torture, cruel, inhuman treatment or punishment or worst forms of degrading treatment;
- Any form of forced or compulsory labour;
- Worst forms of child labour (ILO Convention 182);
- War crimes or serious violations of international humanitarian law;
- Direct or indirect support to non-state armed groups, public or private security forces;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Supplier is not willing to accept the principles stated in the Umicore Global Sustainable Sourcing Policy or does not have similar policies in place.

Umicore will also assess risks in relation to:

- Sourcing from conflict-affected and high-risk areas
- Serious human rights violations
- Corruption and financial crime
- Labour rights and unsafe working conditions
- Environmental harm

As a first step of the risk assessment, Umicore identifies and registers the source of the tungsten raw materials<sup>1</sup> through its chain of custody system consisting of transactional and logistical documents.

Risk factors related to the country, the supplier as well as the sourcing and processing of tungsten more generally are considered to better understand the context and specific risk exposures. In addition to a background screening conducted by Umicore, all suppliers are asked to complete a Self-Assessment Questionnaire, which will determine whether enhanced due diligence is required. Sourcing from high-risk countries will automatically trigger enhanced due diligence. Suppliers will go through a due diligence screening at least once per year, unless for low-risk suppliers who will be assessed at least once every three years.

## Risk Prevention and Mitigation

Where risks are identified, Umicore aims to prevent or mitigate adverse impacts through appropriate measures. Depending on the circumstances, this may include:

- Engaging with suppliers and/or stakeholders for additional information or clarification

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<sup>1</sup> This Framework applies to Umicore's upstream tungsten supply chain where Umicore acts as a Union importer of minerals and metals within the context of the EU Conflict Minerals Regulation (EU) 2017/821.

- Defining concrete, time-bound improvement actions
- Site visits and third-party audit
- Supporting credible third-party assurance and audit mechanisms
- Collaborating with industry peers or other stakeholders

## Decision-Making and Responsible Disengagement

Based on the outcome of due diligence and risk mitigation efforts, Umicore may decide to:

- Continue sourcing relationships where risks are adequately managed
- Temporarily suspend sourcing while corrective actions are implemented
- Terminate business relationships where severe risks are confirmed and mitigation is not feasible or where suppliers are unwilling to engage

Decisions are made with due consideration of legal obligations, the severity of impacts, and potential consequences for people and communities on the ground.

## Governance and Accountability

Umicore has governance structures in place to oversee the implementation of its responsible sourcing commitments for tungsten. Clear internal responsibilities support the consistent application of this Framework and the escalation of significant risks where necessary.

## Stakeholder Engagement and Grievance Mechanism

Umicore recognizes the importance of stakeholder engagement in responsible sourcing.

Internal and external stakeholders are encouraged to raise concerns related to the circumstances of mineral extraction, trade, handling or export of tungsten in Umicore's supply chain. Concerns can be reported (anonymously if required) through the [Umicore integrity line](#) and will be followed up internally with due care.

## Report

In alignment with the OECD Guidance, Umicore commits to publicly communicate on how we implement our supplier due diligence obligations and promote transparency over the supply chain in so far as reasonable, while not disclosing information that may have adverse impacts on Umicore's competitive position.

## References

- The Umicore Way (<http://www.umicore.com/en/aboutUs/umicoreWay/>)
- The Umicore Code of Conduct (<http://www.governance.umicore.com/en/CodeOfConduct/>)
- Umicore Human Rights Policy (<https://www.umicore.com/en/investor-relations/documents-and-policies/umicore-human-rights-policy/>)
- Umicore Global Sustainable Sourcing Policy (<https://www.umicore.com/en/files/secure-documents/74f479e3-6e0f-4f07-95d8-85a03487ef12.pdf>)
- Universal Declaration of Human Rights (<http://www.un.org/Overview/rights.htm>)
- ILO Declaration on Fundamental Principles and Rights at Work (<http://www.ilo.org/dyn/declaris/DeclarationWeb.IndexPage>)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals (<http://www.oecd.org/corporate/mne/mining.htm>)
- Responsible global supply chain of minerals from conflict-affected and high risk areas (<https://www.umicore.com/storage/main/responsiblesupplychainpolicy.pdf>)
- OECD Due Diligence Guidance for Responsible Business Conduct (<https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>)
- United Nations Guiding Principles on Business and Human Rights (<https://www.undp.org/india/publications/united-nations-guiding-principles-business-and-human-rights>)

March 2026  
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