

SeAH Superalloy Technologies – Conflict Minerals Compliance Statement

SeAH Superalloy Technologies is committed to conducting business in an ethical, responsible, and sustainable manner. In alignment with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and applicable international standards, we support efforts to eliminate the use of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (“DRC”) and adjoining countries. Conflict minerals are defined as tantalum, tin, tungsten, and gold (“3TG”), regardless of origin, which may be mined under conditions of armed conflict and human rights abuses.

Our Commitment

SeAH Superalloy Technologies is committed to:

- Sourcing materials responsibly and ethically.
- Supporting conflict-free supply chains.
- Respecting human rights and avoiding contributions to conflict.

We expect our suppliers to share these commitments and to comply with all applicable laws and regulations regarding conflict minerals.

Supply Chain Due Diligence

We have established a due diligence process designed to conform, where applicable, with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This process includes:

- Engaging with suppliers to identify the origin of 3TG in products supplied to SeAH Superalloy Technologies.
- Requesting suppliers to complete and provide conflict minerals reporting documentation (such as the Responsible Minerals Initiative Conflict Minerals Reporting Template).
- Encouraging suppliers to source 3TG only from smelters and refiners that have been validated as conflict-free or are actively participating in recognized audit programs.

Supplier Expectations

Suppliers doing business with SeAH Superalloy Technologies are expected to:

- Implement their own conflict minerals policies.
- Conduct due diligence on their supply chains.
- Provide accurate and timely information regarding the source of conflict minerals upon request.