Accountability report

OMCD TEK HUB SpA is committed to promoting sustainable mineral supply chains for company-relevant metals (tin, tungsten, tantalum, cobalt) according European laws (such as EU Regulation 2017/821) and international applicable standards (such as OECD Due Diligence approach).
In 2023 we revised our policy in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs):

01. Establish strong company management system.
02. Identify and assess risks in the supply chain.
03. Design and implement a strategy to respond to identified risks.
04. Carry out indipendet third-party audit of smelter/refiner's due diligence practices.
05. Report annually on supply chain due diligence.

It is available on our website at https://www.omcd.it/responsible-supply-of-minerals/.

As far as 3TG materials are concerned, this issue is considered relevant for the company, as these minerals are the main raw materials used in our products. On average, about 55% of these materials used in our production come from recycled waste, recovered both internally and externally. The remaining comes from virgin raw materials. Beyond 3TG materials, also cobalt is considered relevant for our company, since it is a necessary binder (intentionally added) of our powder grades products.

All our direct suppliers are smelters/downstream companies that have been verified as conformant smelters/downstream companies according to RMI (Responsible Minerals Initiative).

In 2023, a procedure was defined from our supply chain policy and it was included in the Quality Management System (ISO 9001) of our company. The procedure details the actions and necessary responsibilities to conduct annual due diligence for the responsible supply of minerals.

According to our procedure, all relevant suppliers must provide traceability information on purchased minerals, which is then evaluated in accordance with the data disclosed by the Responsible Minerals Initiative (RMI). Risk mitigation process is monitored with scheduled actions towards suppliers and, in case of critical issues, the company implements corrective actions by initiating a dialogue with the supplier. A designated senior manager, our CEO, is briefed on the gathered information and the actual and potential risks identified in the supply chain risk assessment.

OMCD TEK HUB SpA is not required to file an annual conflict minerals disclosure with the SEC. However, it recently became a member of RMI, in order to obtain more detailed information about the control points identified in the supply chain and cover all risks outlined in the OECD Due Diligence Guidance for Responsible Supply Chains Annex II Model Policy, including the worst forms of child labor. In 2024, a grievance mechanism for all our stakeholders has been implemented and can be found at https://www.omcd.it/responsible-supply-of-minerals/.

100% of our relevant suppliers have responded to our supply chain survey. The majority of our relevant suppliers have adopted and implemented all 5 steps of due diligence, and have been validated by RMI within the Responsible Minerals Assurance Process (RMAP). While others have carried out an independent third-party audit program. Some smelters in our supply chain purchase cobalt and 3TG from the covered countries (DRC and adjoining countries, CAHRAs), but all of them have been verified as RMI conformant.

This document represents the first report published by OMCD TEK HUB SpA on due diligence for responsible supply chains of minerals from conflict-affected and high-risk areas. Information about the Smelters or Refiners (SORs) in the supply chain are provided by OMCD TEK HUB SpA upon customer request through CMRT and/or EMRT. Currently, no customers are contractually requiring conflict minerals due diligence information under the OECD Due Diligence Guidance for Responsible Supply Chains.

Anzola d'Ossola
14/02/2025

Alberto Tedeschi
Member of the board

OMCD TEK HUB SpA
Società soggetta all'attività di direzione e coordinamento di OMCD SpA a socio unico
Via Megolo, 43 - 28877 Anzola D'Ossola (VB) Italia
Cod. Fisc./ P. IVA N. 00116980038 | Tel. (+39) 0323 836386

Registro imprese Monte Rosa Laghi Alto Piemonte n°00116980038
R.E.A. n°VB 70094 – Capitale sociale € 1.174.700 i.v.