

OMCD TEK HUB Due Diligence Report (OECD Step-5 Report)

1. Company Information

The OMCD history is intertwined with the Tedeschi family, who founded the first company in 1948 and has been leading the Group since then. [OMCD Group - Hard materials network](#) initially operating as the Group's commercial department, over the years OMCD gave its name to the group. In order to optimize the services the company has centralised: Administration and Accounts, Environment, Quality and Safety, EDP, Marketing, Purchasing and Tenders under the company UFFICI. A di Davide Tedeschi sas.

Today OMCD TEK HUB S.p.A. is now functioning as a collector of the different brands' technical and commercial experiences.

For more information please see [OMCD Tek Hub SpA is Born: The New Frontier of Hard Metal | OMCD](#) The company operates six facilities in Anzola d'Ossola (VB), one in Premosello-Chiovenda (VB), one in Oggiona con S. Stefano (VA) and one in Cadorago (CO).

2. Company Supply Chain Policy

OMCD TEK HUB SpA is committed to promoting sustainable mineral supply chains for company-relevant metals (tin, tungsten, tantalum, cobalt) according to European laws (such as (EU) Regulation 2017/821) and international applicable standards (such as OECD Due Diligence approach).

The company is committed to address any Annex II risks if identified as stated in our policy, named "Statement of Powder Raw Materials Responsible Sourcing" which is available at [Responsible supply of Minerals | OMCD](#).

In 2023 the policy in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) has been revised. In particular the 5 steps of due diligence have been implemented in our organization:

1. establish strong company management systems;
2. identify and assess risk in the supply chain;
3. design and implement a strategy to respond to identified risks;
4. carry out independent third-party audit of supply chain due diligence at identified points in the supply chain;
5. report on supply chain due diligence.

3. Company Management System

OMCD TEK HUB SpA also holds both ISO 9001 and ISO 14001:

Our quality management certification can be found at [Download | Films](#)

OMCD TEK HUB management has appointed a Senior Management Representative who is responsible for the procurement of raw materials sourced in an ethical manner in accordance with our company policy and procedures (contacts: duediligence@omcd.it).

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 metals and their compounds, 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. The Senior Management Representative,



our CEO, is briefed on the gathered information and the actual and potential risks identified in the supply chain risk assessment.

OMCD TEK HUB S.p.A. is not required to file an annual conflict minerals disclosure with the SEC (US Securities and Exchange Commission), as provided by US Dodd-Frank Act. 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.

OMCD TEK HUB has itemised all its raw materials; in this way all purchases are monitored and easily identifiable.

The workshop is capable of recognizing the items and if they encounter any inconsistencies, they are reported to the Purchasing Manager. All incoming raw materials are sampled and analysed in our laboratory Hi.Lab.

The grievance mechanism on our website [Sustainability | OMCD](#) is in place in case of any complaints regarding illegal or unethical conduct that could be out of our control.

4. Risk Identification

OMCD TEK HUB S.p.A. has implemented a system management to qualify the suppliers reported in the qualified suppliers list.

OMCD TEK HUB S.p.A. asks all suppliers both CMRT and EMRT, once received the company confronts the documents with the conformant and active smelter list published on the RMI (Responsible Minerals Initiative) at the link [RMI Active and Conformant Facilities List](#). In case the company identifies a risk, it is immediately evaluated with the supplier to attend to solve it.

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, tin, tungsten, tantalum from the covered countries (DRC and adjoining countries, CAHRAs), but all of them have been verified as RMI conformant. Since its membership in RMI, our company evaluates the audit reports performed by independent third-party to our direct suppliers related to imports of relevant metals according to (EU) Regulation 2017/821.

5. RMAP Assessment for the 3T (tungsten, tantalum, tin) and Cobalt

Date of Assessment: 14-15 October 2025

Assessment period: 01 October 2024 to 30 September 2025

Assessment firm: Arche Advisors

6. Conclusion

OMCD TEK HUB S.p.A. feel a great responsibility toward our partners in all the supply chain, that is why in 2025 it will be audited to be recognized as RMI conformant downstream company.

