



# Responsible Minerals Sourcing Policy

While we do not procure directly, our suppliers acquire and use minerals from multiple sources worldwide. NanoSlick Lubricants is committed to the responsible sourcing of minerals –sourcing done in an ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain.

Traditionally, the industry focus and governmental regulations (notably Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act “Dodd-Frank”<sup>1</sup>) have addressed tin, tungsten, tantalum, and gold (also known as 3TG or “conflict minerals”) sourced from the Democratic Republic of Congo (DRC) or adjoining countries. The concern is that these conflict minerals could originate from mines controlled by armed militia and that mineral sales contribute to human rights abuses. As part of NanoSlick Lubricant’s commitment to responsible sourcing, it is our goal to ensure that the 3TG in our products do not directly or indirectly finance or benefit armed groups in the DRC or adjoining countries while continuing to support responsible mineral sourcing in the region.

Prompted by growing concerns about child labor and additional human rights violations beyond the scope of Dodd-Frank, NanoSlick Lubricants has evolved its responsible minerals program and related due diligence practices to address minerals originating from Conflict-Affected and High-Risk Areas(CAHRAs).<sup>2</sup> NanoSlick Lubricant’s program framework is in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas(OECD Guidance)<sup>3</sup>

NanoSlick Lubricant suppliers are required to:

- Comply with the Responsible Business Alliance (RBA) Code of Conduct.
- Conduct their business in accordance with NanoSlick Lubricant’s guidelines for supply chain responsibility and transparency.
- Establish and maintain a publicly available policy on responsible mineral sourcing that aligns with the OECD Guidance.
- Establish due diligence frameworks and management systems consistent with the OECD Guidance.
- Extend all these expectations to their own suppliers.

In support of this policy, NanoSlick Lubricant commits to:

- Exercise due diligence with relevant suppliers consistent with the OECD Guidance.
- Provide and require our suppliers to provide, due diligence information confirming that tantalum, tin, tungsten, gold, cobalt, or other minerals determined to be from CAHRAs are responsibly sourced.
- Collaborate with customers, suppliers, and industry associations such as the Responsible Minerals Initiative (RMI) on long-term solutions to enable responsible sourcing.
- Encourage smelters in our supply chain to undergo a third-party assessment, such as the Responsible Minerals Assurance Process (RMAP)<sup>4</sup>.
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public.

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<sup>1</sup>Dodd-Frank Section 1502: In 2012, the U.S. Securities and Exchange Commission (SEC) adopted rules mandated by the conflict minerals disclosure provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These rules require publicly traded companies to report annually on the source and chain of custody of conflict minerals in products manufactured by the company.

<sup>2</sup>OECD definition of Conflict-Affected and High-Risk Areas (CAHRAs): Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence, or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.

<sup>3</sup>OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance): Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, and related Supplements on Tin, Tantalum and Tungsten and on Gold.

<sup>4</sup>Responsible Minerals Assurance Process (RMAP): The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP) uses an independent third-party audit of smelter/refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The audit employs a risk-based approach to validate smelters' company-level management processes for responsible mineral procurement. Companies can then use this information to inform their sourcing choices