Taki Chemical Co., Ltd. Tantalum Supply Chain Policy

Taki Chemical Co., Ltd. is a smelter manufacturing high-purity tantalum oxide. We recognize the risks that we are possibly involved in the armed conflict or serious abuses of human rights through the tantalum mineral supply chain. We establish, implement, and continuously improve our Responsible Minerals Management System in conformance with OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict - Affected and High-Risk Areas and Responsible Minerals Initiative's Responsible Minerals Assurance Process.

We will not tolerate following actions related to our tantalum mineral supply chain.

- · Any forms of torture, cruel, inhuman and degrading treatment
- Any forms of forced or compulsory labour
- Worst form of child labour defined in ILO Convention No.182
- Other gross human rights violations and abuses such as sexual violence
- War crimes or other serious violations of international humanitarian low, crime against humanity or genocide
- Direct or indirect support to non-state armed groups

We will immediately stop engaging with upstream supply chain actors where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as listed above.

We will immediately implement the risk mitigation plan where we identify risks that public or private security forces illegally control the mine sites, transportation routs, or upstream suppliers in our tantalum mineral supply chain. We will stop engaging with the related supply chain actors if the risk mitigation is not achieved.

We will not offer, promise, give or demand any bribes in the tantalum mineral supply chain. We will refuse any kind of bribes to conceal or disguise the origin of minerals, or to misrepresent taxes, fees and royalties paid to governments.

We will stop engaging with supplier where we identify the money laundering in our tantalum mineral supply chain.

We will confirm that taxes, fees, and royalties related to our tantalum supply chain are paid to governments.

We will comply with the related regulations when we transport tantalum minerals which are classified into Class7 of UN Dangerous Goods Classification.

We will avoid cash transactions where practicable and ensure cash transactions are supported by verifiable information in our tantalum mineral supply chain.

We will support the implementation of the principles and criteria set under the Extractive Industry Transparency Initiative (EITI) as needed.

Effective Date: 12 June, 2018 Revision Date: 1 December, 2019

Taki Chemical Co., Ltd. Management Planning Dept.