

Samuel, Associated Tube Group (ATG) POLICY on Responsible Minerals Sourcing

2023

Responsible Minerals Sourcing

Purpose

- This policy is to ensure social, ethical, and environmental implications of conflict minerals source from regions affected by armed conflicts and human rights abuse. ATG aims to uphold responsible business practices, promote transparency, and contribute to the efforts in eliminating the use of conflict minerals within our supply chain.

Scope

- This Policy applies to all ATG suppliers involved in sourcing and supply of minerals, specifically focusing on Cobalt, Mica, aluminum, copper, lithium, nickel (+ other minerals/metals) used in products that may be identified as contributing to conflict.

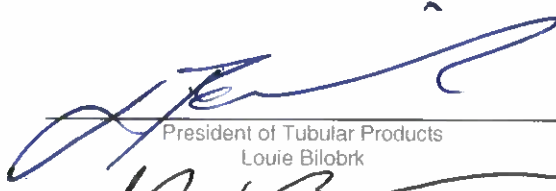
Policy

- ATG is committed to ensuring minerals used in our products do not finance armed conflicts or contribute to human rights violations
- We will exercise due diligence to identify the origin of minerals in our supply chain and take appropriate actions to avoid the use of conflict minerals
- We will collaborate with our suppliers annually on reporting, to ensure responsible sourcing practices and ensure conflict free mineral supply chain.
- ATG supply chain will implement due diligence processes consistent to the internationally recognized frameworks, such as OEDC Due Diligence Guidance, to trace the origin of minerals and assess risk with their supply chain. This is accomplished through yearly reporting.
- ATG will regularly review and update this policy to align with evolving industry standards and best practices
- Non-compliance will lead to corrective actions to align with the policy and potential suspension/termination of supply


References and Definitions

- Guidance from; Dodd-Frank Wall Street Reform and Consumer Protection Act: Section 1502 of this U.S. legislation required companies to disclose their use of conflict minerals.


Approved by:



President of Tubular Products
Louie Bilobrk



Director of Materials Management
Neal Newman



Director of Technical Development Engineering
Philip Williams

Document Name:	ATC POLICY GUIDELINE	Document Number:	ATC – POLICY	Page Reference:	Page 1
Controlled By:	Materials Management	Effective Date:	August 2023	Revision Number:	0
Author:	Neal Newman	Approved by:	President of Samuel Tubular Group, Director of Materials Management, and Technical Development Engineering		

This document is considered uncontrolled if printed – The controlled version is currently maintained in Controlled Documents