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*S.P.T. spol. s r.o.
Special Products and Technologies
Pražská 600
252 10 Mníšek pod Brdy
Czech Republic*

Annual Published Due Diligence Report on Conflict Minerals

1. Company information

Company name: S.P.T. spol, s.r.o. (SPT)

RMI CID: CID005068

Registered address: Pražská 600, Mníšek pod Brdy, Czech Republic

3TG material processed: Tungsten

Audited facility: Facility B - Tungsten recycling and processing operations
summary: SPT operates two metallurgical facilities: Facility A (recycles molybdenum-containing materials) and Facility B (recycles tungsten-containing materials). Tungsten feedstock comprises secondary recycled/scrap materials, being used catalysts sourced solely from suppliers within Europe.

2. RMAP assessment summary

Facility B underwent an RMAP assessment on **23–24 June 2026** for the assessed period **01 January 2025 – 31 May 2026**. The assessment was conducted by **BDO LLP (London)** and the Lead Assessor was **David Dicker**. A public summary URL is available at <https://sptltd.eu/traceability/>

3. Supply chain policy

SPT maintains a Responsible Minerals Supply Chain Policy aligned with the **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance)** and the **RMI RMAP Tungsten Standard**. The policy addresses all Annex II risks, was effective throughout the reporting period and applies globally. Senior management reviews and approves the policy and supports implementation. The policy, together with our “Raw Material Procurement Statement” and “Modern Slavery Act Statement,” is communicated to relevant stakeholders. The policy is furthermore incorporated into contracts and written agreements with our material suppliers.

4. Management systems

Governance: The Managing Director holds ultimate accountability for supply chain due diligence.

Responsibilities: The **Procurement Director / Due Diligence Program Manager** oversees responsible sourcing, supported by the **Procurement Manager** for implementation.

Training: All responsible sourcing team members receive initial and annual refresher training covering the Supply Chain Policy, SPT's Code of Business Conduct, relevant industry codes and the RMI's due-diligence expectations. SPT reviews its **Manual for Responsible Supply Chains** annually, defines actions to address any gaps, and reports results to senior management.

Monitoring and Continuous Improvement: SPT conducts an annual management review of its due diligence system, with findings formally documented and reported to senior management, and where necessary, corrective and preventive actions are identified and tracked through to closure. During the 2025–2026 reporting period, continuous improvement efforts included enhancements to supplier onboarding documentation, the strengthening of CAHRA monitoring procedures through the formalization of quarterly updates, and system alignment updates implemented in response to recommendations arising from the prior RMAP audit in February 2025.

5. Internal systems of control

SPT maintains controls aligned with the OECD five-step framework, including: policy communication to upstream suppliers; supplier onboarding and documentation; transaction-level checks; risk assessment workflows; and approval controls to ensure only approved materials are released to tungsten production, with segregation of any non-approved materials.

6. Record-keeping and mass balance

SPT retains due-diligence records for at least **five years**, including inbound and outbound shipment records. SPT operates a mass-balance process to calculate and track all tungsten-containing materials, covering opening inventory, receipts, WIP, production losses and outputs/shipments. The mass balance for the reporting period reconciled within the RMAP tolerance threshold (<10%), with no unexplained discrepancies identified between declared and closing inventory.

7. Risk identification and assessment

Know-Your-Supplier (KYS): SPT collects and reviews legal identity, beneficial ownership, operational mapping and risk indicators for all suppliers. Inconsistencies or gaps are investigated and resolved. All suppliers are screened against relevant national / international sanction lists. Responsible sourcing requirements are incorporated into supplier agreements, and long-term relationships are actively maintained to enhance supplier compliance.

CAHRA determination: SPT determines whether any materials originate in or transit via Conflict-Affected and High-Risk Areas (CAHRAs). Determinations reference the EU's **indicative, non-exhaustive CAHRA list**, the Dodd-Frank Act (DFA), and is complemented by broader open-source monitoring. SPT reviews its CAHRA determination at least **quarterly** and upon material new information, with all relevant documentation maintained.

Red-flag review: SPT screens for red-flag indicators as set out in the OECD Guidance and the RMAP Tungsten Standard. Any red flags trigger enhanced due diligence commensurate with risk.

2025 - 2026 risk determination: Based on the procedures above, SPT received secondary materials from **low-risk sources** only in 2025 - 2026 and did **not source from countries or sub-regions included on the EU CAHRA list**. No red flags were identified, and SPT nonetheless continues to apply OECD-aligned due diligence to all sources.

8. Risk management and mitigation

SPT applies proportionate mitigation consistent with OECD Step-3 where risks are identified, including engagement with suppliers, corrective-action planning, escalation to senior management, and (where warranted) suspension or disengagement for the most severe impacts. Monitoring tracks implementation and effectiveness over time. Given the absence of identified risks in the reporting period, no risk mitigation measures were required.

9. Stakeholder engagement & grievance mechanisms

SPT maintains an open-door, confidential grievance mechanism for internal and external stakeholders via **spt@sptltd.eu**, telephone **+420 318 591 379**, and via management contacts listed at <https://sptltd.eu/traceability/>. Concerns are documented, investigated, and remediated per RMAP expectations with documented corrective actions. However, no material supply chain grievances were received in the reporting period.

10. Regulatory context

SPT's due diligence framework aligns with the **EU Conflict Minerals Regulation (EU) 2017/821**, which requires EU importers of 3TG to implement OECD-aligned due diligence for supply chains potentially linked to CAHRAs.

11. 2025 - 2026 outcomes and continuous improvement

During the reporting period, SPT's due-diligence activities (KYS, CAHRA determination, red-flag screening and transaction-level controls) did **not identify Annex II risks** in the tungsten supply chain. SPT will continue to strengthen its systems, maintain quarterly CAHRA reviews, and implement any improvements recommended during the **June 2026** RMAP assessment, including timely closure of any corrective actions.

During the reporting period, SPT has made significant strides in strengthening its supply chain due diligence practices.

The following activities were completed to enhance our due diligence management system:

- Improvements to the company website to better communicate our responsible sourcing commitments, policies, and progress reports to stakeholders.
- Drafting and implementation of a comprehensive Supplier Policy outlining expectations for ethical, environmental, and social standards.
- Successfully completing SPT's first RMAP (Responsible Minerals Assurance Process) assessment. This involved a comprehensive independent audit of our due diligence practices, including supply chain mapping, risk assessments for CAHRAs, KYC processes, and management system controls. The assessment confirmed full conformance with the RMAP standard, validating our responsible sourcing program and enhancing our credibility with customers and stakeholders.
- Review and updates to core policies including KYC Procedure, CAHRA identification procedures, and Supply Chain Due Diligence Policy.
- Enhanced supplier onboarding processes with integrated risk screening and documentation requirements.
- Training programs for internal teams on due diligence best practices and risk mitigation strategies.
- Stakeholder engagement initiatives, including supplier audits and collaboration on responsible sourcing.
- The SPT supply chain policy is published at our website (<https://sptltd.eu/traceability/>)



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These initiatives have resulted in improved risk identification and mitigation, stronger supplier relationships, and enhanced transparency. SPT is well-positioned to meet evolving regulatory requirements and industry expectations.

Signed, on behalf of S.P.T. spol, s.r.o. (SPT)

Name: Václav Bumbálek
Title: Managing Director
Date: June 29th, 2026

S.P.T. spol. s.r.o.
Pražská 600
252 10 Mníšek pod Brdy
IČO: 48035424 DIČ: CZ48035424