

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk-Areas

TANiOBIS Group Due Diligence Report for Raw Materials Supplies in Year 2025 (OECD 5-Step Report)

Reporting period 01-12/2025

1. Group Information

TANiOBIS GmbH is a leading global producer with over 60 years of experience in processing of a broad range of high-quality tantalum and niobium-based materials. Since July 1st, 2018, TANiOBIS GmbH has been a part of the JX Nippon Mining & Metals Group

Our Locations:



Facilities information:

TANiOBIS GmbH

Im Schleeke 78-91; D-38642 Goslar

RMI smelter ID: CID002545 for Tantalum

TANiOBIS Smelting GmbH & Co. KG

Ferroweg 1; D-79725 Laufenburg, Baden-Württemberg

RMI smelter ID: CID002550 for Tantalum

RMI smelter ID: CID002542 for Tungsten

TANiOBIS Co., Ltd.

5, I-3A Road, Map Ta Phut; Industrial Estate Rayong 21150

RMI smelter ID: CID002544 for Tantalum

Assessment Company: Arche Advisors

TANiOBIS Japan Co., Ltd.

Hitachi Ohmiya-shi; Iberaki 319-2134 Mito

RMI smelter ID: CID002549 for Tantalum

For more details see

[our-sites](#)

2. RMAP Assessment

TANI OBIS GmbH

Im Schleeke 78-91; D-38642 Goslar

RMI smelter ID: CID002545 for Tantalum

Assessment Scope: Tantalum

Assessment period: 06/16/2024 – 07/31/2025

Assessment Date: 09/08/2025 – 09/10/2025

Assessment Company: Arche Advisors

Result: TANI OBIS GmbH is conformant with the Assessment Standard for Tantalum (2017).

- The assessment was conducted in accordance with ISO19001 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
- The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process, Tin and Tantalum Standard.

TANI OBIS Smelting GmbH & Co. KG

Ferroweg 1; D-79725 Laufenburg, Baden-Württemberg

RMI smelter ID: CID002550 for Tantalum

RMI smelter ID: CID002542 for Tungsten

Assessment Scope: Tantalum and Tungsten

Assessment period: 07/01/2024 – 07/31/2025

Assessment Date: 09/12/2025 – 09/12/2025

Assessment Company: Arche Advisors

Result: TANI OBIS Smelting GmbH & Co. KG is conformant with the Assessment Standard for Tantalum (2017) and conformant with the Assessment Standard for Tungsten (2017).

- The assessment was conducted in accordance with ISO19001 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
- The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process, Tin and Tantalum Standard | Responsible Minerals Assurance Process, Tungsten Standard.

TANI OBIS Co., Ltd.

5, I-3A Road, Map Ta Phut; Industrial Estate Rayong 21150

RMI smelter ID: CID002544 for Tantalum

Assessment Scope: Tantalum

Assessment period: 06/23/2024 – 08/31/2025

Assessment Date: 10/01/2025 – 10/02/2025

Assessment Company: Arche Advisors

Result: TANI OBIS Co., Ltd. is conformant with the Assessment Standard for Tantalum (2017).

- The assessment was conducted in accordance with ISO19001 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
- The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process, Tin and Tantalum Standard.

TANI OBIS Japan Co., Ltd.

Hitachi Ohmiya-shi; Iberaki 319-2134 Mito

RMI smelter ID: CID002549 for Tantalum

Assessment Scope: Tantalum

Assessment period: 07/01/2024 – 08/31/2025

Assessment Date: 10/03/2025 – 10/03/2025

Assessment Company: Arche Advisors

Result: TANI OBIS Japan Co., Ltd. is conformant with the Assessment Standard for Tantalum (2017).

- The assessment was conducted in accordance with ISO19001 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations.
- The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process, Tin and Tantalum Standard.

RMAP Assessment summary:

TANI OBIS GmbH, TANI OBIS Smelting GmbH & Co., KG and TANI OBIS Co., Ltd. are a member of the ITRI Tin Supply Chain Initiative (iTSCi), that has developed a due diligence system for a transparent raw material supply chain in conflict regions and monitors the implementation of the system in their member companies. TANI OBIS GmbH is also a full member of the Responsible Mineral Initiative.

Since 2011 the TANI OBIS GmbH and its affiliates TANI OBIS Smelting GmbH & Co.KG; TANI OBIS Japan Co., Ltd. and TANI OBIS Co., Ltd. are a continuously approved Conflict Free Smelter / Responsible Smelter.

Also, some points for improvement are identified.

1. The auditee has established a new Grievance mechanism available in 43 languages accessible from their website

3. Company Management System

Besides the RMAP assessments (Responsible Minerals Assurance Process by Responsible Minerals Initiative) the TANI OBIS Group is certified according to ISO 9001, ISO 14001, some of its legal entities according to ISO 50001, and ISO 45001 as well. In addition to the HSEQ aspects the Senior Management has appointed a Manager for Raw Material Compliance responsible for supply chain management (RSCM) including the raw material due diligence process.

The Management Representative reports directly to the CEO / COO of the company. Within the RSCM, the Manager Raw Material Compliance coordinates the work of the relevant departments (incl. Supply Chain Management, Procurement, Quality Management, Customer Service) to ensure that each department follows up on its roles and responsibilities to implement the due diligence process. The process is documented in an IT document management system. Quality control was done by ISO 17025 certified own laboratory in Map Ta Phut (accredited for Tantalum Metal Powder) and contracted laboratories. All relevant departments undergo due diligence management system training when changes or risk have been identified. In 2025 was a continue process on improving due diligence control documentation at each approval of single deliveries by Manager Raw Material Compliance in a database called Osiris. It's now fully implemented for TANI OBIS GmbH, TANI OBIS Smelting GmbH & Co., KG. and for TANI OBIS Co., Ltd.. TANI OBIS Japan Co., Ltd. Received only intermediate material from TANI OBIS GmbH and TANI OBIS Co., Ltd.. A approval of each single delivery is not necessary. An additional safety net is implemented via SAP inspection plan, whereby incoming raw material stock is automatically blocked for quality inspection upon GR posting and released to unrestricted stock only upon inspection completion and acceptance.

4. Internal Systems of control

4.1 Company Supply Chain Policy

This policy is valid for the TANI OBIS GmbH and its affiliates TANI OBIS Smelting GmbH & Co.KG; TANI OBIS Japan Co., Ltd.; TANI OBIS Co., Ltd. and TANI OBIS USA LLC.

As responsible corporate citizens, we pursue excellence in fulfilling governmental, industrial and environmental standards worldwide. We are committed to comply to all relevant sanctions, in particular UN resolutions, as well as all national and international legislations.

Update from 2024 - 2025. Following part was added to the policy:

Resulting from the lack of reliable and acceptable due diligence systems in the DRC and Rwanda due to the escalating regional conflict, smuggling and illegal taxation

issues, we have suspended raw material sourcing from these countries. We will continue to monitor the situation and will adjust our raw material policy as it deems appropriate.

The acceptance of our Raw Material Policy is part of each order.

[Raw Material Policy](#)

4.2 Supplier Qualification

Before starting business with a new supplier (also sub-supplier), there is a detailed check conducted by Raw Material Compliance together with Procurement to identify risk in the supply chain according to Annex 2 of the OECD Guidance and the EU regulation for Conflict Minerals. This is described in our supplier qualification system. This procedure as for qualification system is also used to requalify active suppliers and sub-suppliers yearly.

4.3 Know Your Counterpart (Supplier)

All suppliers (Companies, Manager, Owners and beneficial Owners) undergo the **Know Your Counterpart** process as first step of the qualification. For the KYC Process we use information from supplier and from external source. This check is done in our SAP GTS system based on governmentally approved and own sanction lists. Where possible, subcontractors are also checked in the same way.

For suppliers under the due diligence systems of ITSCI and BSP the KYC Check is done by ITSCI and BSP and therefore as an improvement we started also to make the KYC check at these suppliers.

The KYC data is collected also in the OSIRIS System.

4.4 Identification of CAHRAs

CAHRAs are identified by using different sources on the internet and are checked for links to the supplier. The sources are listed in the company guidance for CAHRA's check. Furthermore, the indicative EU CAHRAS list is used for assessment. If a potential risk is found, an onsite visit and audit at the supplier is mandatory. The process based on the EU-Regulation and the COMMISSION RECOMMENDATION (EU) 2018/1149 of 10 August 2018

In 2023, sourcing out of CAHRAs done within RMI and OECD approved due diligence systems and with additional measurements for some areas. Several mines in North Kivu are blocked during 2023.

End of 2023 we stopped sourcing in DRC and Rwanda according to the lack of reliable and acceptable due diligence systems in the DRC and Rwanda due to the escalating regional conflict, smuggling and illegal taxation issues, we have suspended raw material sourcing from these countries. Last deliveries out of these regions are exported before 31.12.2023.

In 2025, we maintained our suspension of sourcing from DRC and Rwanda as initiated in late 2023.

4.5 Scope of Risk Assessment

For each raw material supplier, we do a risk mitigation according to Annex III of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk-Areas.

4.6 Internal Control

Each raw material delivery is internally controlled by the Manager Raw Material Compliance during internal audits and must fulfill the RMAP Standard and the EU Regulation for Conflict Minerals.

All relevant documents and data are stored for a minimum of 5 years. All due diligence documents for the deliveries are stored also in electronic files on a server. The traceability of all procured and used raw materials including quantities, analyses etc. is guaranteed by the SAP system.

4.7 Intermediates

All intermediates processed by the group in 2025 were sourced from smelters/refiners that are listed by the RMI as RMAP conformant tantalum and tungsten smelters. Tin Slag is only sourced from smelters/refiners that are listed by the RMI as RMAP conformant tin smelters.

Tin slag processed in 2025 was derived from tin ore mined since June 2024, ensuring all sources are within the monitored period and compliant with RMAP standards.

5. Risk Assessment (only High-Risk sourcing)

As an active member of iTSCi during this reporting period we received the following documents from iTSCi for each high-risk sourcing transaction:

- 1) iTSCi Traceability reports including Baseline Audit Reports for the mines
- 2) Incident summary reports (monthly)
- 3) Mine Visit Recommendations including a list of mine sites with potential risks (it is advised that companies sourcing from these mine sites conduct enhanced due diligence and risk assessment)
- 4) Monthly country and region report, which reviews the general situation of the country and region
- 5) iTSCi Alerts for risk in the supply chain
- 6) Data summary and other reports

This information is reviewed by the Manager Raw Material Compliance who informs the management and relevant people about due diligence risks identified in the documents. The iTSCi documents listed above have been visible to all relevant persons in the document management system since 2020 and are archived there. For suppliers not covered by iTSCi, TANI OBIS conducts an independent risk assessment which includes:

- 1) KYC questionnaire covering supplier identity, legal status, ultimate beneficial owners, origin of material, and transport routes
- 2) Document review including company registration, mining license, and certificate of payment of taxes
- 3) Plausibility check of origin based on geological literature and industry sources

- 4) Assessment of Annex II risks covering torture and cruel treatment, forced or compulsory labour, child labour, serious violations of international humanitarian law, support of public or private forces, money laundering, bribery, and non-payment of taxes
- 5) EITI status review for the source country
- 6) Biodiversity and protected areas check

Results are documented and reviewed by the Manager Raw Material Compliance. In evaluating the risk associated with sourcing raw materials, TANI OBIS conducts systematic data gathering through supplier documentation review, KYC assessments, and engagement with upstream assurance program providers. TANI OBIS maintains regular communication and verification with suppliers and iTSCi to identify and address any potential issues that could affect the supply chain before and after accepting materials. Where necessary, on-site visits to mines and exporters in CAHRAs are conducted to verify sourcing conditions and support risk identification. TANI OBIS is confident that all materials received comply with RMAP standards and are conflict-free.

6. Risk Mitigation (only High-Risk sourcing)

iTSCi

We check with the iTSCi secretariat to obtain details of the risk mitigation process:

- 1) iTSCi identify the specific source of the material including the name of the producer and exporter
- 2) We are informed by iTSCi about the progress of risk mitigation for the reported risks in the subsequent reporting period.
- 3) We are informed by iTSCi about the methodology for addressing the risks including who performed risk mitigation activities
- 4) We get regular updates by iTSCi of the risk mitigation activities for relevant supply chains

We check, if necessary, also with other source risk in the supply chain. As an example, the correct taxation of the exported materials.

We check every iTSCi Traceability Report and ask iTSCi if anything is unclear or errors in order to rule out risks in our supply chain.

7. Grievance Mechanisms

If anyone presents grievances (employees as well as externally interested) in the procurement of raw materials in the supply chain of the TANI OBIS Group, he could contact TANI OBIS via “contact us” on our homepage. The message is then forwarded to the Manager Raw Materials Compliance who will review it for plausibility and forward it to the management for further decision.

Or the complainant uses the Grievance mechanism of the Responsible Minerals Initiative

[RMI Grievance Mechanism](#)

There, the RMI, as an independent institution, decides on the further course of action and follows the further course of action.

As at end of 2024 the own Grievance mechanism is installed.

A direct link to the Grievance system is given on the homepage of TANI OBIS. See link below.

<https://taniobis-group.lawcode.cloud/hbx/>



Since 2024, there were no grievances related to the raw material supply chain of the TANI OBIS Group.

8. Reporting on Risks beyond Annex II

In addition, supply chain risk assessment includes evaluating the location of a resource (mine) in relation to a protected area or world heritage site.

9. Non-conformances in deliveries of secondary material

No non-conformances were identified in the deliveries of secondary materials during the 2025 reporting period.

10. Summary

The implemented supply chain due diligence procedures and delivery checks for the 2025 reporting period strictly adhere to the *OECD Due Diligence Guidance and Regulation (EU) 2017/821*. Our assessment covers the responsible sourcing of tin, tantalum, tungsten, and gold (3TG) to ensure compliance with international standards regarding conflict-affected and high-risk areas (CAHRAs). Based on our comprehensive review, no unknown risks have been identified, confirming the integrity and transparency of our mineral supply chain.

Rayong, Map Ta Phut, June 15th, 2026

Wuttikorn Pramom
Raw Material Compliance Manager
TANI OBIS Group