

RESPONSIBLE MINERALS POLICY

Purpose

K-TOOL Engineering Sdn Bhd (K-TOOL) is committed to responsible sourcing of materials used in our manufacturing operations. We do not mine, smelt, or refine raw minerals, nor do we purchase directly from mining operations. As a precision engineering company, we source metals and alloys from established, reputable suppliers — and we are clear that our position downstream in the supply chain does not reduce our responsibility.

We expect that the materials used in our operations do not contribute to armed conflict, human rights abuses, or corruption anywhere in our supply chain. Our approach is guided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Minerals In Scope

This policy covers minerals associated with responsible sourcing obligations and those procured as part of our manufacturing operations. The minerals in scope are:

- Tungsten — widely used in cutting tools, carbide tooling, and hard metal grades
- Copper — procured as a raw material for manufacturing
- Nickel — present in tool steel alloys, surface treatments, and carbide binder formulations
- Gold — included within the scope of the conflict minerals framework (3TG) referenced by customers and industry bodies

Our Commitments

We do our best to understand where the minerals in our supply chain come from and identify any associated risks. We do not knowingly source materials from conflict-affected or high-risk areas linked to armed groups, human rights violations, or systemic corruption. Where concerns arise, we will engage with our suppliers accordingly.

We will respond to customer requests for mineral sourcing information and will cooperate with supply chain due diligence enquiries as required.

Supplier Expectations

We expect our material suppliers to comply with applicable laws and regulations on mineral sourcing, conduct their own supply chain due diligence, and respond to our sourcing enquiries when requested. Suppliers unwilling to engage with reasonable due diligence requests will be subject to review of our business relationship.