



OECD Responsible Mineral Supply Chain Due Diligence Statement

Black Controls Company Inc. supports the adoption of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. As per these guidelines, companies that are active in mineral supply chains should carry out comprehensive due diligence.

As we are not actively sourcing minerals from any mine, and only purchase equipment and parts from suppliers who also do not directly source minerals from mines, we do our best to determine the country of origin of products. Our suppliers can provide us with a company level CMRT for review. The presence of a specific smelter or refiner in the reporting template does not mean that these components are in the products we buy. As our position is a downstream buyer of products, we are many tiers removed from the smelters or source mines and cannot conclusively determine the chain of custody for purchased products.

We fully cooperate with the CMRT and will complete this on an annual basis. We will follow up with any suppliers that provide smelters that are deemed unacceptable to inform them and work with them to remove these smelters from their supply chains.

References

1. Organisation for Economic Co-operation and Development (OECD). (2016). *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* (3rd ed.). OECD Publishing, Paris. <http://dx.doi.org/10.1787/9789264252479-en>
2. Organisation for Economic Co-operation and Development (OECD). (2021). *Monitoring and Evaluation Framework: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. OECD Publishing