



## Material Content and Source Requirements

### I. Applicability

This document applies to all Woodward business units and sites worldwide, including affiliates and subsidiaries. Compliance to this document is required of all Suppliers of Products/Items/Articles that form the content of Woodward Products, and/or are used in the manufacturing processes of Woodward Products, and/or Services performed on the Article/Item/Product, (e.g.: painting, anodizing, passivation, soldering or any process which changes the material content of the item that is provided to Woodward), and/or are used in the repair and/or overhaul of Woodward Products, to include Woodward internally manufactured Components/Subassemblies/Articles and their associated manufacturing processes.

### II. Definitions

**“3TG’s”** refers to Tin, Tantalum, Tungsten and Gold, the four metals that are the subject of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 and the REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017.

**“AD-DSL”** means Aerospace and Defense Declarable Substance List, a list of Substances developed by consortium of the major aerospace manufacturers known as the International Aerospace Environment Group (“IAEG”) for which the aerospace, defense, and heavy equipment industries are working to reduce or eliminate use in Products, production processes and repair/overhaul operations. Each of the Substances on the list has some form of Restriction in some segment of the global marketplace. The list can be found at <http://www.iaeg.com/chemicalrpt/>. IPC 1754 is the preferred standard and template to report use of Substances on this list.

**“AD-SRT”** means Aerospace and Defense Substance Reporting Tool and is a manual spreadsheet alternative to IPC 1754 for reporting use of Substances on the AD-DSL. The template is found at <http://www.iaeg.com/chemicalrpt/>.

**“Article”** means an object which during production is given a special shape, surface or design which determines its function to a greater degree than does its chemical composition, as defined by REACH. For the avoidance of doubt, once an object is an “Article”, it will always be an “Article” regardless of where in the end product the object resides.

**“CAHRA”** means Conflict-Affected and High-Risk Area. These are identified by the presence of armed conflict, widespread violence, or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law” (OECD due diligence guidance).

**“California Proposition 65”** is a law enacted in the State of California (United States) in November 1986, formally known as the Safe Drinking Water and Toxic Enforcement Act of 1986. Proposition 65 requires businesses to provide warnings to Californians about exposure to chemicals that cause cancer, birth defects or other reproductive harm. These chemicals can be in the products that Californians purchase, in their homes or workplaces, or that are released into the environment. Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water. More information about this law and the substances it regulates can be found at <https://oehha.ca.gov/proposition-65>.



**“CMRT”** means Conflict Minerals Reporting Template, which is the de facto template for companies to report the smelters or refiners that provided the tin, tantalum, tungsten and/or gold contained in their products that were smelted and/or refined from ores that were obtained from CAHRAs.

**“Component”** means those parts, materials, or Substances which forms the product.

**“Concentration”** means weight percent of a substance at the homogenous material or article level.

**“CRT”** means Cobalt Reporting Template, which serves the same purpose for cobalt as the CMRT (defined above) serves for tin, tantalum, tungsten, and gold.

**“DoC”** means a Declaration of Conformance.

**“ECHA”** European Chemical Agency.

**“EU”** means European Union. “European Union is an international organization comprising 27 European countries and governing common economic, social, and security policies” (Britannica).

**“EU SRR”** Regulation (EU) No 1257/2013 of the European Parliament and of the Council of 20 November 2013 on ship recycling.

**“Hong Kong Convention (HKC)”** Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009 SR/CONF/45.

**“Inventory of Hazardous Materials (IHM)”** table of regulated/prohibited materials as defined per EU SRR or HKC.

**“FMD or FSD”** mean Full Material Disclosure or Full Substance Disclosure, whereby *every* chemical, Substance, Preparation, and/or Homogeneous Material contained within an Article, Item or Product is identified along with its concentration level in a standard reporting form for that Article, Item or Product. That standard and associated form may be either IPC 1754 (WAM 1 edition) (used by aerospace and defense, and heavy equipment industry business units) (classes E, F or G) or IPC 1752A/B (used by other industrial business units) (classes A, C or D).

**“Homogeneous Material”** means one material of uniform composition throughout or a material, consisting of a combination of materials, which cannot be disjointed or separated into different materials by mechanical actions such as unscrewing, cutting, crushing, grinding and abrasive processes, per EU RoHS Directive 2011/65/EU definition.

**“IMDS”** means International Material Data System.

**“IPC”** refers to the Association of Electronics Industries, a consortium that has established the formats and transmission protocols for reporting of material information. These include but are not limited to IPC 1752 (FMD/FSD for product material content), IPC 1754 (FMD/FSD for product production materials, content materials, and repair/overhaul materials), and IPC 1755 (Conflict Minerals).

**“Item”** shall be synonymous with the term ‘Component’.

**“OECD”** is the Organization for Economic Co-operation and Development. It is the organization that has published the only internationally recognized framework for due diligence guidance for the responsible sourcing of minerals (and therefore derived materials) from Conflict-Affected and High-Risk Areas.



“**PFAS**” refer to per-and polyfluoroalkyl substances which are chemicals used to make fluoropolymer coatings and products that resist heat, oil, stains, grease, and water as regulated by EPA/TSCA and ECHA/REACH.

“**Preparation**” means a mixture or solution composed of two or more Substances.

“**Product**” means any physical good provided by a Supplier to Woodward.

“**REACH**” means the version of Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals that is in effect as of the date of shipment of the applicable Product. The REACH regulation, and supporting guidance relating thereto, can be found at the following website: <https://echa.europa.eu/regulations/reach/legislation>. The “REACH Regulation” sub link found there allows one to access the consolidated regulation in one’s language of choice.

REACH encompasses three major lists of substances with unique obligations:

- **Candidate List of Substances of very high concern for Authorization (Candidate List):** The list can be found at <https://echa.europa.eu/candidate-list-table>.
- **Authorization List (Annex XIV):** The list can be found at <https://echa.europa.eu/authorisation-list>.
- **Restriction List (Annex XVII):** The list can be found at <https://echa.europa.eu/substances-restricted-under-reach>.

“**Restriction**” means any condition for or prohibition of the manufacture, use or placing on the market.

“**RFP**” means Request for Proposal.

“**RFQ**” means Request for Quotation.

“**RMI**” means Responsible Minerals Initiative. RMI is a subset of the Responsible Business Alliance and is the organization responsible for: 1) maintaining and updating the CMRT and CRT; 2) identifying minerals besides those identified as Conflict Minerals that are mined in CAHRAs other than the Democratic Republic of the Congo and surrounding countries; 3) developing, executing, and managing one of the recognized assurance processes for SORs (defined hereunder) to be classified as following conflict-free sourcing practices; and 4) maintaining a record of SORs, their assurance and activity status, and identifying the Country(ies) of Origin of the mine(s) that they source from; among other related objectives.

“**RoHS**” means the version of Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the Restriction of the use of certain Hazardous Substances Directive in electrical and electronic equipment that is in effect as of the date of shipment of the applicable Product. This includes the Commission Delegated Directive (EU) 2015/863, which added four phthalates and any other Delegated directives or corrigenda to Directive 2011/65/EU that are in effect as of the date of shipment of the applicable Product. The RoHS directive, and supporting guidance relating thereto, can be found at the following website: <http://eur-lex.europa.eu/oj/direct-access.html>.

“**SCIP**” means Substances of Concern In complex articles as such or in complex objects (Products). It is the EU central database for information on Articles containing Substances of Very High Concern (SVHCs) on the Candidate List in a concentration above 0.1% weight by weight (w/w) placed on the EEA market. Additional general information on SCIP can be found at <https://echa.europa.eu/scip-database>.

“**SDS**” means a Safety Data Sheet.



**“Services”** mean operations performed by a Supplier or internally by Woodward on an Article, Item or Product provided to Woodward which change the material content of that Article, Item, or Product (e.g.: painting, anodizing, passivation, soldering, etc.).

**“SOR”** means Smelter or Refiner, an entity that converts a mined ore into a commercially usable material.

**“Source”** means the identity of the mine of origin of the ore which was smelted or refined into the specified metal or material contained within any Item, Article or Homogeneous Material within a Product. This will typically be determined via identifying the smelter or refiner that processed the ore into the specified metal.

**“Substance”** means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition, as define in REACH (Article 3).

**“Supplier”** and **“Seller”** shall be used interchangeably and shall mean a person or an organization providing Products and/or Services to Woodward.

**“Supply Chain”** and **“Sub-Tier Supplier”** shall be used interchangeably and includes, but is not limited to, the lowest downstream supplier providing raw material contained in the Products.

**“SVHC”** means Substance of Very High Concern under REACH.

**“WFD”** means EU Waste Framework Directive, 2008/98/EC, which sets out measures addressing the adverse impacts of the generation and management of waste on the environment and human health, and for improving efficient use of resources which are crucial for the transition to a circular economy. SVHC’s reported above the specified threshold must be reported into the SCIP database if imported or manufactured in the EEA. Additional general information on WFD can be found at <https://echa.europa.eu/understanding-wfd>.

### **III. Material Content Requirements**

#### **A. Reporting**

In order to meet material requirements of its customers and markets and to comply with local, regional and national laws, Woodward will regularly submit inquiries to Suppliers to obtain current Substance content of Articles, Items, and/or Products that Woodward obtains from Supplier, and may also require Substance content of manufacturing processes and repair/overhaul processes for those Articles, Items and/or Products. To this end:

1. Supplier shall determine or obtain and then record, the content of those Substances identified as containing a Restriction in one or more of the following directives and regulations as specified by the Woodward inquiry to Supplier:

- a. RoHS, as defined above;
- b. REACH, as defined above;
- c. Additional WFD and SCIP information for Articles containing REACH SVHCs above the 0.1% w/w threshold, as defined above;



- d. EU SRR/HKC/IHM, as defined above;
- e. California Proposition 65, as defined above;
- f. AD-DSL using the AD-SRT format, as defined above; and/or
- g. Other material content regulations that come into force for Woodward compliance to customer requirements or compliance to Woodward marketplace requirements after release of these Material Content and Source Requirements, as specified by the Woodward inquiry to Supplier.

2. Supplier shall disclose such content of Substances that contain a Restriction for each Item or raw material it sells or otherwise provides to Woodward. Substance content shall be separately identified for each Homogeneous Material, Sub-Tier Supplier Item, and Article that is contained in the subject Item or raw material.

3. Woodward is supported in its product content compliance efforts by a third-party Software-as-a-Service system, which includes supplier engagement support by staff of the platform provider. Woodward Suppliers are directed to work with our third-party provider as if Supplier were engaging with Woodward directly. A separate Woodward Authorization Letter will be provided to Suppliers as part of our Supplier inquiry campaigns. Supplier responses will typically be submitted through the Supplier's unique Portal link to the platform, and Supplier questions or issues are to be submitted either via e-mail to the platform contacts provided or via chat capability within the Portal itself.

4. Suppliers must provide a compliance verdict for each Article/Item/Product, and/or Services performed on the Article/Item/Product, by answering the questions within their Supplier Portal link to our third-party Software-as-a-Service material compliance platform. In addition, Suppliers must provide substantiating documentation supporting their verdict(s). Woodward prefers that Suppliers support their verdicts with Full Material Disclosures (FMD/Full Substance Disclosures (FSD). An FMD/FSD submission may either be a Class D level of IPC 1752B (for replies for the Woodward Industrial Segment business units) or as a Class G level of IPC 1754 WAM 1 for replies for the Woodward Aerospace Segment business units). *As a minimum*, Suppliers shall submit a Declaration of Conformance (DoC) as their supporting documentation in one of the following formats:

- a. IPC 1752B Class A
- b. IPC 1754 WAM 1 Class E
- c. Declaration of Conformance Letter, which must at a minimum comply with all of the following standards:
  - i. Be prepared on Supplier's company letterhead (Preferred Method).
  - ii. Identify the regulation and date of the Substance list being reported.
  - iii. Provide the compliance status for each Article/Item/Product *as shipped to Woodward*, along with the identity of any exemptions or exclusions being declared and the rationale for their use; and
  - iv. Be signed by a person in the company having the authority to make or approve such declarations along with the person's signature block (name, position/title, e-mail address and phone number)

5. Suppliers of Articles which are chemicals (Substances, Preparations) may provide a properly executed SDS containing the company name, address, and contact data in lieu of a Declaration of Conformance Letter. Any SDS must comply to the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).

#### **B. Submissions for Supplier Legacy / Production Articles / Items / Products**



Woodward intends for its supply chain to grow into FMD/FSD reporting for all Articles/Items/Products that are used in the content of, manufacturing of, and repair/overhaul of Woodward Products. Therefore, Suppliers who respond to a Woodward request with a DoC (in one of the four approved forms noted above), shall comply with the following reporting growth roadmap:

1. Within six (6) months after submission of a DoC for specified Articles/Items/Products, Supplier shall update that submission with an IPC 1752B Class C (Industrial) or IPC 1754 WAM 1 Class F (Aerospace) for those same Articles/Items/Products, including coverage of any changes to the relevant regulations' Substance lists since the DoC submission. These classes require identifying any Substance within the Supplier's Article/Item/Product that appears on the relevant regulations' Substance lists, *along with the Concentration of the Substance within the Article/Item/Product.*
2. Within 6 months after submission of an IPC 1752B Class C or IPC 1754 WAM 1 Class F (as applicable) for Supplier Articles/Items/Parts, the Supplier shall provide a FMD/FSD submission on the applicable IPC form for the same Articles/Items/Products, including coverage of any changes to the relevant regulations' Substance lists since the prior submission. Woodward may upon Supplier request permit the use of the intellectual property considerations cited in the "FMD or FSD" definition above, given reasonable justification for such use.
3. Once a Supplier has provided a FMD/FSD submission for an Article / Item / Product, that document may serve as the substantiation document for any future verdict inquiries regarding material content unless an occurrence or event that changes or potentially changes the Substance content of the supplier Item, Article or Product, including but not limited to:
  - a. Any change in supplier of any Homogeneous Material, Item or Article for the Supplier's Product; or
  - b. Any change in the recipe for the manufacture of Supplier's and/or Sub-Tier Supplier's Article, Item or Product.

Supplier shall submit their revised FMD/FSD forms to Woodward, along with justification for the change and effectivity date or lot for the change, as soon as possible but no later than fifteen (15) calendar days prior to first shipment of the applicable revised Article/Item/Product, or at such other time as specified by Woodward for the subject procurement.

4. Both IPC 1752 and IPC 1754 forms may be prepared online using a free Materials Declaration Tool provided by Woodward's third-party Software-as-a-Service material compliance solution provider. The tool may be accessed at: <https://www.assentcompliance.com/assent-materials-declaration-tool/>.

### **C. Supplier Submissions for Woodward First time Acquisition of a Supplier Article / Item / Product**

As part of Supplier's response to a Woodward RFP, RFQ and/or Request for Information (RFI) for a Woodward first-time acquisition of a Supplier Article, Item or Product, Supplier shall provide a preliminary DoC (in one of the four approved formats noted above) for the offered Articles/Items/Products to the Woodward requestor, so that Woodward may ascertain or confirm that they conform to the necessary compliance requirements. After receipt of a Supply Agreement or Purchase Order for the offered Articles/Items/Products, Supplier shall submit FMD/FSD forms, if available, to Woodward in both .pdf and .xml formats at least fifteen (15) calendar days prior to first shipment of the applicable Articles / Items / Product, or at such other time as specified by Woodward for the subject procurement. If an FMD/FSD submission is not available at the Woodward specified time, then Supplier must submit a DoC (in one of the four approved formats described above) at the specified time, and then follow the reporting growth roadmap cited above for Legacy and Production reporting. Both IPC 1752 and IPC 1754 forms may be prepared online using a free Materials Declaration Tool provided by Woodward's third-party Software-as-a-Service material compliance





solution provider. The tool may be accessed at: <https://www.assentcompliance.com/assent-materials-declaration-tool/>.

#### **D. International Material Data System Reporting**

When directed by Woodward, Supplier shall provide the initial and any revised Substance content data for their provided Article(s)/Item(s)/Product(s) into the IMDS for the specified Woodward Product(s) supported under a contract or purchase order. IMDS is a free online material management tool, available at [www.mdssystem.com](http://www.mdssystem.com). The automotive industry created IMDS for material reporting and management. IMDS is a Woodward customer requirement for specific part numbers.

#### **E. Follow-on / Mitigation Actions**

When a Supplier declares an Article/Item/Product to contain a Substance of concern from a specified regulation, and specifics of that content would prohibit a Woodward Product containing Supplier's Article/Item/Product from being shipped to Woodward customers or markets, or place Restrictions on such shipment, then Supplier shall conduct and/or support efforts to determine and implement an appropriate mitigation action.

### **IV. Material Source Requirements**

#### **A. Reporting**

In order to meet the requirements of its customers and markets regarding the responsible sourcing of identified mineral content within Woodward Products (down to the mine Country of Origin) that originate from identified CAHRAs, and to comply with local, regional and national laws, Woodward will submit inquiries to Suppliers, annually, to obtain their current SOR sources for materials produced from specified minerals that are contained in items procured from Suppliers and that were used in Woodward Products introduced into the stream of commerce during a specified calendar year. To this end:

Supplier shall determine or obtain and then record, the material source down to the SOR level of each material in each of their Article(s)/Item(s)/Product(s) that they provide to Woodward, that were derived from a mineral of concern as identified in one or more of the following regulations and as specified in the Woodward inquiry to the Supplier:

- a. Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, as implemented by the Securities and Exchange Commission Final Rule of August 2012 (with subsequent informal updates / clarification due to litigation).
- b. REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.
- c. Any other local, regional, or national mineral source regulation that represents a Woodward marketplace requirement for Woodward Products to which the Supplier contributes and which are specified in the Woodward inquiry to Supplier.

Woodward is supported in its material source compliance efforts by a third-party Software-as-a-Service system, which includes Supplier engagement support by staff of the platform provider. *Woodward Suppliers are directed to work with our third-party provider as if Supplier were engaging with Woodward directly.* A separate Woodward Authorization Letter will be provided to Suppliers as part of our Supplier inquiry campaigns. Supplier responses will



typically be submitted through the Supplier's unique Portal link to the platform, and Supplier questions or issues are to be submitted either via e-mail to the platform contacts provided or via chat capability within the Portal itself.

#### **B. Submissions for Supplier Legacy / Production Articles / Items / Products**

Woodward intends for its supply chain to rapidly grow into the practice of obtaining all materials that are derived from minerals of concern mined in identified CAHRAs, from SORs that are designated as following conflict-free sourcing practices according to a recognized third-party (such as RMI) audit, i.e.: that all Items provided to Woodward by its supply chain are "conflict-free". To that end:

1. Where possible, and upon Woodward inquiry, Supplier shall complete and submit a separate Item level CMRT of current edition, which can be downloaded from, [RMI CMRT](#), for each Item or separate material that Supplier sells or otherwise provides to Woodward. Item families, (i.e.: multiple Items sharing an identical recipe and identical SORs for the minerals of concern) may be itemized and reported on a single CMRT. When Supplier and/or Supplier's sub tiers are unable to provide Item and/or Item family level source information, Supplier shall obtain company level disclosures and consolidated lists of smelters and refiners from their sub tiers and create a Supplier composite company level/roll-up CMRT and submit that in lieu of the Item/separate material CMRTs.
2. Where possible and applicable, and upon Woodward inquiry, Supplier shall complete and submit a separate Item level CRT of current edition to report the sources of cobalt, if present, in any Supplier Item or separate material that the Supplier sells or otherwise provides to Woodward. The CRT can be downloaded from [RMI Cobalt Reporting Template \(CRT\)](#). Item families, (i.e.: multiple Items sharing an identical recipe and identical SORs for the minerals of concern) may be itemized and reported on a single CRT. When Supplier and/or Supplier's sub tiers are unable to provide Item and/or Item family level source information, Supplier shall obtain company level disclosures and consolidated lists of smelters and refiners from their sub tiers and create a Supplier composite company level/roll-up CRT and submit that in lieu of the Item/separate material CRTs.
3. Supplier shall submit revised CMRTs and/or revised CRTs, as applicable, to Woodward for any occurrence or event that changes or potentially changes the SOR source(s) of material from that reported in the previously submitted CMRT and/or CRT, as applicable, at any lower Item or material level within the Supplier-provided Item or material, including but not limited to:
  - a. Any change in source or supplier of any Homogeneous Material, Item or Article;
  - b. Any change at any Sub-Tier Supplier level in their source(s) or supplier(s) of any Homogeneous Material, Item or Article contained within Supplier's Product(s) provided to Woodward; and
  - c. Any change in the recipe for the manufacture of Supplier's Item or material.
4. Suppliers shall submit their revised CMRT(s) and/or CRT(s), as applicable, to Woodward, along with justification for the change and effectivity date or lot for the change, at least fifteen (15) days prior to first shipment of the applicable revised Product, or at such other time as specified by Woodward for the subject procurement.
5. For Suppliers of Legacy/Production Articles/Items/Products to Woodward that currently report at a company level for CMRT and/or CRT submissions, said Suppliers will be required to report at the Item or Item family level for those Articles/Items/Products for the annual Woodward inquiry that is at least six (6) months following receipt of these Material Content and Source Requirements, and for any subsequent inquiries.

#### **C. Supplier Submissions for Woodward First time Acquisition of a Supplier Article / Item / Product**





1. As part of Supplier's response to a Woodward Request for Proposal (RFP), Request for Quotation (RFQ) and/or Request for Information (RFI) for a Woodward first-time acquisition of a Supplier Article, Item or Product, Supplier shall provide a preliminary CMRT and CRT (if applicable) of current edition, so that Woodward may ascertain the anticipated SOR risk status for the subject Article / Item / Product. The CMRT form may be downloaded from [RMI CMRT](#). The CRT can be downloaded from [RMI Cobalt Reporting Template \(CRT\)](#). After receipt of a Supply Agreement or Purchase Order for the offered Article / Item / Product, Supplier shall submit a revised CMRT and CRT (if applicable) to Woodward, reflecting the actual SORs used by the supply chain for the subject Article/Item/Product *as shipped to Woodward* at least fifteen (15) calendar days prior to first shipment of the applicable Article/Item/Product, or at such other time as specified by Woodward for the subject procurement.

2. If the above CMRT and/or CRT submissions were at the company level, Supplier must provide Item or Item family level (i.e.: multiple Items sharing an identical recipe and identical SORs for the minerals of concern) submissions at the first annual Woodward inquiry that is at least 6 months after the above submission(s), and for any subsequent inquiries.

#### **D. Additional Material Source Documentation Requirements**

For Woodward and its supply chain to validate the accuracy of and to achieve completeness of their CMRT and/or CRT submissions, the SOR data collection for each Supplier in the Woodward supply chain must result from due diligence efforts and a due diligence process. That due diligence process must align with the OECD's guidance for responsible mineral sourcing in CAHRAs. Woodward therefore requests each Supplier submitting a CMRT and/or CRT in response to Woodward's annual inquiry to also provide as part of that submission either:

- a. A copy of their responsible mineral sourcing due diligence process document; or
- b. The link to the Supplier's public, unrestricted-access web page where such document is posted.

Suppliers that are U.S. publicly traded companies in accordance with the Securities and Exchange Act of 1934 (as amended) may provide in lieu of the above either a copy of or an accessible link to a posting of their most recent Calendar Year Conflict Minerals Report submitted to the U.S. Securities and Exchange Commission.

#### **E. Follow-on / Mitigation Actions**

When a Woodward Supplier determines that their supply chain for the Article(s)/Item(s)/Product(s) that Supplier provides to Woodward has reported use of a high-risk SOR for materials contained in the subject Article(s)/Item(s)/Product(s), the Woodward Supplier shall perform the following mitigation actions:

- a. Send an official letter to each identified high-risk SOR urging them to immediately participate in an independent third-party audit for conflict-free sourcing practices, such as the RMI's Responsible Mineral Assurance Process (RMAP), which is described at [RMI RMAP Introduction](#).
- b. Direct their suppliers (down through the supply chain) to submit similar letter to high-risk SOR that they or their suppliers have reported.
- c. Work with their supply chain to consider alternate material suppliers that use SOR classified as following conflict-free sourcing practices if the letters to the high-risk SOR in use do not yield favorable results.
- d. Document the risk mitigation efforts Supplier and their suppliers have taken with respect to high-risk SOR in subsequent submissions of CMRTs and / or CRTs.

#### **F. Administration**



Supplier must inform Woodward immediately of any point of contact changes for Supplier material content inquiries and/or material source point of contact changes. All such updates shall be e-mailed by Supplier to their Woodward representative. Supplier shall also provide these changes to Woodward's third-party material compliance provider, either directly via their Supplier Portal or via the provided e-mail address for the third-party provider.



## **REVISION RECORD**

<b>Change Date</b>	<b>Revision Level</b>	<b>Approval</b>	<b>Description</b>
March 23, 2022	10	Pam Bartel	Added a revision record table to this Material Content and Source Requirement.
March 21, 2024	11	Brian Sharrar	Updated verbiage in definitions and other sections for clarity. Removed FMD/FSD tables. Updated SDS standard requirement.
April 4, 2024	13	Brian Sharrar	Updated reference documents in Document properties.