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DOMESTIC MATERIAL ASSURANCE

Strengthening Supply Chains for Defense and Critical Manufacturing

Enabling next-generation defense production through U.S.-based powder processing, end-to-end material traceability, and circular material recovery.

Executive **Overview**

Federal procurement priorities continue to place greater emphasis on domestic manufacturing, resilient supply chains, and transparent material sourcing. Across defense, aerospace, energy, and other strategic industries, manufacturers are increasingly expected to demonstrate not only material performance, but also where those materials come from and how they are produced.

For organizations supporting the U.S. defense industrial base, supplier selection increasingly extends beyond chemistry and mechanical properties. Domestic processing, traceability, supply continuity, and responsible sourcing are becoming important considerations during supplier qualification and procurement.

Continuum Powders' U.S.-based reclamation, melting, and atomization platform aligns with these evolving priorities by converting domestically recovered titanium and nickel-alloy feedstock into high-quality metal powders while maintaining documented traceability throughout the production process.

Why This **Matters**

Defense and critical manufacturing organizations are increasingly evaluating suppliers based on their ability to support broader supply-chain objectives, including:

Domestic **Processing**

U.S.-based production capabilities that support domestic sourcing objectives and reduce reliance on overseas processing.

Material **Traceability**

Greater visibility into material origin, processing history, and the pathway from feedstock through finished powder.

Supply-Chain **Resilience**

Additional domestic capacity and sourcing pathways for strategically important materials.

Reduced Foreign **Dependency**

The ability to recover valuable materials already within the domestic industrial base and return them to productive use.

Responsible Material **Recovery**

Circular manufacturing pathways that preserve high-value feedstocks rather than allowing them to leave the domestic material ecosystem.

Reliable Quality **Documentation**

Material characterization and lot-level information designed to support demanding manufacturing and qualification requirements.

Selecting suppliers capable of supporting these objectives can help reduce procurement risk while strengthening long-term supply continuity.

How Continuum Supports **These Objectives**

Customer Priority	Continuum Capability
Domestic Production	U.S.-based reclamation, melting, and atomization
Material Traceability	Documented chain of custody and lot traceability
Circular Manufacturing	Recovery and reprocessing of valuable alloy feedstocks
Supply Resilience	Alternative domestic source for critical metal powders
Quality Assurance	Comprehensive chemistry, PSD, and production documentation
Technical Collaboration	Engineering support from development through production

Material Focus

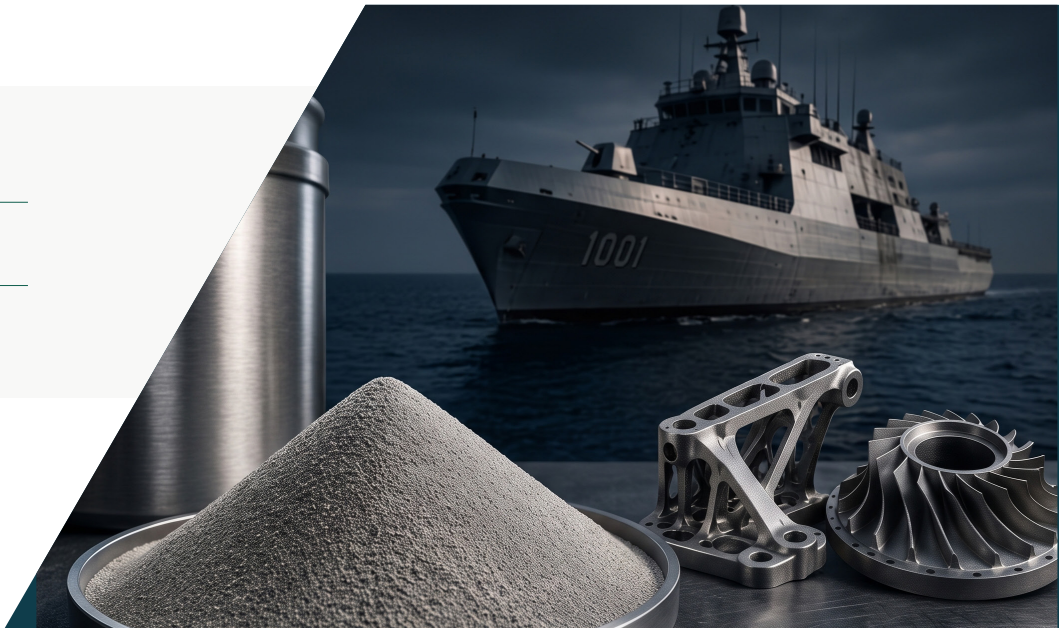
Reclaimed **Titanium**

Titanium remains one of the most strategically important materials used throughout aerospace and defense manufacturing. Domestic availability and processing capability have become increasingly important as manufacturers seek to reduce supply-chain risk and improve sourcing transparency. Titanium and titanium alloys are also expressly treated as specialty metals under applicable DFARS provisions, making sourcing and production history particularly relevant for covered defense applications.

Continuum recovers qualifying titanium feedstock through domestic operations before performing melting and atomization within the United States, creating high-quality powder suitable for demanding additive manufacturing and advanced manufacturing applications.

This creates a domestic pathway through which valuable titanium machining material, production returns, and other suitable feedstocks can be recovered and returned to productive use rather than lost from the domestic material ecosystem.

- Domestic Processing
- Traceability
- Circular Recovery



Reclaimed **Nickel Superalloys**

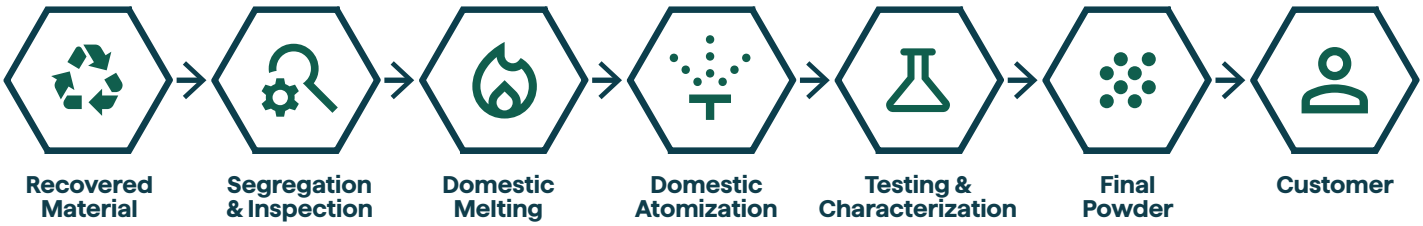
Nickel-based superalloys play a critical role in propulsion systems, energy infrastructure, aerospace applications, and defense manufacturing.

Continuum's domestic processing capabilities support the recovery and conversion of qualifying nickel-alloy feedstocks into premium metal powders while maintaining documented production history and traceability throughout the manufacturing process.

Unlike titanium, the regulatory treatment of nickel alloys under specialty-metals provisions depends on the specific alloy composition. For this reason, Continuum evaluates individual nickel-alloy material streams based on chemistry, source, processing history, and applicable customer or contract requirements rather than making a blanket compliance claim for all nickel products.

This material-specific approach can provide customers with the information necessary to evaluate individual powders against the sourcing and documentation requirements of their programs.

Traceability **& Documentation**



Continuum's domestic material model is designed to provide visibility into the pathway from recovered feedstock through finished powder.

For qualifying defense-facing material streams, production lots may be supported by documentation covering:

- Feedstock source
- Prior alloy identification and available certifications
- Chain of custody
- Domestic production locations
- Final chemistry
- Particle size distribution
- Production lot identification
- Quality documentation

The availability and scope of individual documentation elements may depend on the specific feedstock stream, customer program, and contractual requirements.

Alignment with Current **Federal Priorities**

While compliance requirements remain contract-specific, Continuum's manufacturing model aligns with the broader direction of current U.S. defense procurement and critical-material policy emphasizing

- Domestic production of specialty and strategically important materials
- Improved material and supplier traceability
- Greater supply-chain resilience
- Reduced dependence on unreliable foreign suppliers
- Recovery and domestic processing of critical materials
- Increased visibility into upstream material sources

Relevant federal guidance includes DFARS specialty-metals provisions, NDAA-related defense sourcing initiatives, and Defense Production Act actions supporting domestic processing and retention of critical materials.

Continuum's role is to provide customers with domestic material and a production pathway, together with supporting traceability and quality documentation, that can help customers address applicable sourcing requirements.

Final compliance remains subject to individual contract requirements, applicable alloy chemistry, material origin, source documentation, processing history, and current federal regulations.

Why **Continuum**

Continuum Powders combines domestic processing, circular manufacturing, and advanced atomization into a single integrated platform designed to support demanding aerospace, defense, and industrial applications.

By recovering valuable domestic material streams and converting them into premium metal powders within the United States, Continuum helps customers strengthen supply-chain resilience while maintaining the quality, documentation, and technical collaboration expected for mission-critical programs.

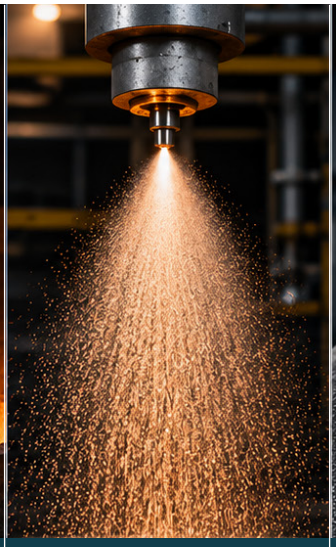
Domestic material. Advanced processing. Documented traceability.
A more resilient path to production.

Feedstock

Recovered, recycled, and responsibly sourced materials.

Melting

Domestic melting for clean, consistent, high-quality metal.

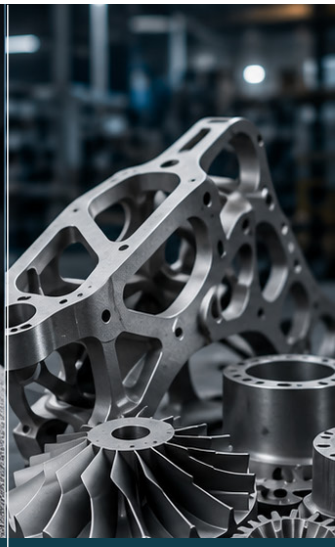


Atomization

Advanced atomization technology produces spherical metal powders.

Metal Powders

High-performance powders with controlled chemistry and particle characteristics.



Finished Components

Enabling next-generation manufacturing across critical industries.

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Appendix A
Regulatory Reference

1 Purpose and **Scope**

This appendix provides additional context regarding the U.S. defense procurement and critical-material policies relevant to Continuum Powders' domestic reclamation, melting, and atomization capabilities.

It is intended as a general reference for customers evaluating domestic material sourcing and supply-chain requirements. Applicability and compliance should be evaluated against the requirements of each individual contract, material, and program.

2 DFARS Specialty **Metals Provisions**

The Defense Federal Acquisition Regulation Supplement (DFARS) establishes sourcing requirements for certain specialty metals incorporated into products delivered under covered U.S. Department of Defense contracts.

Under the DFARS specialty-metals framework, titanium and titanium alloys are expressly treated as specialty metals. Certain nickel and iron-nickel alloys may also qualify depending on their composition and the percentage of alloying elements present.

Importantly for metal powder production, the DFARS definition of "produce" includes atomization. This makes the location of powder production directly relevant when evaluating domestic-production requirements.

For covered contracts, DFARS 252.225-7008 generally requires specialty metals to be melted or produced in the United States, its outlying areas, or as otherwise permitted under the applicable clause. DFARS 252.225-7009 provides additional requirements, exceptions, and treatment of qualifying-country sources for specialty metals incorporated into certain end items and components.

Continuum's U.S.-based reclamation, melting, and atomization capabilities can support customers seeking domestically produced specialty-metal feedstocks when the applicable material, processing history, and chain of custody satisfy contract-specific requirements.

Customer **Consideration**

Domestic atomization is an important component of sourcing analysis, but it should not be treated as a stand-alone guarantee of DFARS compliance. Compliance depends on the specific contract clause, material, upstream source, processing history, and required documentation.

3 NDAA-Related Sourcing and **Supply-Chain Requirements**

Recent federal defense policy has continued to emphasize strengthening the domestic industrial base and reducing reliance on potentially unreliable or adversarial foreign sources.

The direction described in current federal policy includes greater attention to:

- Domestic production and processing capacity
- Raw material and supplier traceability
- Identification of upstream material origin
- Supplier vetting and supply-chain visibility
- Reduced use of sourcing waivers where domestic alternatives are available
- Migration away from unreliable foreign suppliers

The underlying regulatory assessment also identifies Executive Order 14415 as directing stricter observance of 10 U.S.C. § 4872 and limiting certain waivers beginning January 1, 2027.

These developments increase the strategic importance of suppliers that can provide visibility beyond the final manufacturing step and document where critical materials originate, how they move through the supply chain, and where they are ultimately processed.

Continuum's domestic material recovery and processing model is directionally aligned with these objectives by creating a U.S.-based pathway for recovering valuable alloy feedstocks and returning them to productive use.

Customer **Consideration**

NDAA requirements vary by program, contract, product, and material. Applicable sourcing requirements should therefore be evaluated at the contract level rather than relying on a generalized "NDAA compliant" designation.

4 Defense Production Act – **July 2026 Determination**

On July 30, 2026, a Presidential Determination under the Defense Production Act (DPA) addressed recoverable critical minerals and materials as resources important to U.S. national defense.

Of particular relevance to circular manufacturing, the determination encompasses recoverable material streams including swarf and other waste or scrap containing qualifying critical minerals and materials.

The action recognizes that materials already present within industrial waste and scrap streams can represent strategically important domestic resources rather than simply manufacturing waste.

The determination delegates Section 101 DPA authority to the U.S. Department of Commerce. The accompanying White House policy description further indicates that Commerce has authority to institute export restrictions affecting qualifying recoverable critical minerals and materials.

This creates a potentially important policy direction for manufacturers generating or processing high-value titanium, nickel, and other critical-material scrap streams: retaining, recovering, and processing these materials domestically may become increasingly important to U.S. industrial and national-security policy.

At the time of this document, however, the determination should not be interpreted as a material-specific prohibition on exporting Continuum titanium or nickel powder or feedstock. Specific requirements will depend on subsequent Commerce implementation, including any applicable rules governing licensing, allocation, reporting, or export restrictions.

Customer **Consideration**

The July 2026 DPA action reinforces the strategic value of domestic material recovery. Customers should continue to evaluate applicable export-control requirements based on material classification, destination, end use, and subsequent implementing regulations.

5 Material-**Specific Considerations**

Titanium and **Titanium Alloys**

Titanium and titanium alloys are expressly included within the DFARS definition of specialty metals, making sourcing and production location particularly relevant for defense applications subject to applicable specialty-metals provisions.

A domestic recovery model in which qualifying titanium machining scrap, swarf, production returns, or other suitable feedstock is collected and documented, then melted and atomized within the United States, can provide a strong foundation for supporting domestic specialty-metal sourcing objectives.

Continuum's model can support documentation of the material pathway from recovered feedstock through final powder production, including source information where available, material identification, chain of custody, domestic processing locations, final chemistry, particle size distribution, and lot identification.

Titanium-bearing swarf and scrap may also fall within the broad recoverable-material framework established by the July 2026 DPA determination where the material meets applicable critical-material definitions.

Final applicability remains dependent on material origin, contract requirements, processing history, documentation, and any subsequent federal implementation.

Nickel and **Nickel-Based Alloys**

Nickel requires a more material-specific assessment.

The presence of nickel alone does not automatically cause a material to qualify as a specialty metal under the DFARS provisions. The underlying regulatory assessment notes that nickel and iron-nickel alloys generally qualify when alloying metals other than nickel and iron exceed the applicable 10-percent-by-mass threshold. Many nickel-based superalloys used in aerospace, propulsion, energy, and defense applications may meet this definition.

Accordingly, nickel-based materials should be evaluated by specific alloy and chemistry rather than through a blanket specialty-metals or compliance claim covering all nickel powders.

Reclaimed nickel-superalloy scrap, machining material, and swarf may also be relevant to the DPA recoverable-material framework.

For defense-facing material streams, Continuum can support characterization based on:

- Alloy designation and chemistry
- Source and form of recovered material
- Available prior material certifications
- Processing and production locations
- Chain of custody
- Final powder chemistry and specification
- Lot identification and supporting quality documentation

This material-specific approach allows customers to evaluate the powder against the actual requirements of their contract or program rather than relying on a generalized sourcing designation.

6 Additional Regulatory **References and Definitions**

DFARS 252.225-7008 – Restriction on Acquisition of **Specialty Metals**

Addresses restrictions applicable to the acquisition of certain specialty metals and establishes requirements concerning where covered specialty metals are melted or produced.

DFARS 252.225-7009 – Restriction on Acquisition of Certain Articles Containing **Specialty Metals**

Addresses specialty metals incorporated into certain covered articles and components, including applicable exceptions and qualifying-country provisions.

Specialty **Metal**

For purposes relevant to Continuum's portfolio, the DFARS specialty-metals definition includes titanium and titanium alloys as well as certain nickel, iron-nickel, cobalt, and other qualifying alloys meeting defined composition thresholds.

The applicable definition should always be evaluated against the specific alloy being supplied.

"Produced"

Under the applicable DFARS specialty-metals framework, production includes processes such as atomization. This is particularly relevant to metal powder because the location of atomization can therefore form part of the domestic-production analysis.

10 U.S.C. § 4872

Provides statutory requirements concerning the procurement of certain strategic materials and specialty metals for U.S. defense applications and forms part of the underlying statutory framework implemented through applicable defense acquisition regulations.

Defense Production Act

The Defense Production Act provides the federal government with authorities intended to support and expand domestic industrial capabilities considered necessary for national defense.

The July 30, 2026 Presidential Determination identified recoverable critical minerals and materials as resources relevant to national defense and delegated specified DPA authority to the Department of Commerce.

Recoverable Critical **Minerals and Materials**

As described in the July 2026 determination referenced in the underlying regulatory assessment, this category includes qualifying materials contained within recoverable waste or scrap streams, including swarf.

This treatment is particularly relevant to circular material models because it recognizes certain manufacturing byproducts and scrap streams as potential strategic resources.

Qualifying **Country**

Certain DFARS specialty-metals provisions recognize materials melted or produced in designated qualifying countries under specified circumstances. Applicability depends on the relevant clause, product, source, and contract requirements.

7 Documentation and **Traceability**

For defense-facing titanium and qualifying nickel-alloy materials, Continuum can maintain or provide, as applicable, a traceability package documenting key elements of the material and production pathway, including:

- Country and facility of feedstock or scrap generation
- Prior alloy identity and available material certifications
- Chain of custody through collection, segregation, blending, melting, and atomization
- U.S. location of applicable production steps
- Final chemistry and material characterization
- Particle size distribution
- Production lot identification
- Screening for applicable restricted or unreliable foreign sources
- Export classification and destination review where required

The availability and scope of individual documentation elements may depend on the specific feedstock stream, customer program, and contractual requirements.

Important **Compliance Notice**

Continuum Powders' domestic reclamation and production capabilities can support customer efforts to satisfy applicable domestic-sourcing, specialty-metals, traceability, and supply-chain requirements. They should not be interpreted as establishing blanket NDAA, DFARS, or DPA compliance for every material, customer, or application.

Compliance is ultimately dependent on the specific contract, applicable clauses, alloy chemistry, material origin and processing history, required certifications, end use, and current federal regulations.

Customers should evaluate the requirements applicable to their individual program and engage Continuum early when specific sourcing, traceability, or documentation requirements must be satisfied.