Conflict Minerals Policy

Background

In 2012, the U.S. Securities and Exchange Commission (SEC) released regulations governing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act"), which aim to prevent the use of certain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and adjoining countries.

Specifically, the Act requires companies to trace the Tantalum, Tin, Tungsten and Gold (known as 3TG) in their products through the supply chain and disclose whether they came from "conflict mines" in the Democratic Republic of the Congo (DRC).

In addition, in January 2021, the Conflict Minerals Regulation came into force across the EU, requiring companies to ensure they import these minerals and metals (3TG) from responsible and conflict-free sources only.

Our Conflict minerals policy applies to all entities within the Ependion Group and is to be seen as a complementary to our Code of Conduct and to our Human Rights Policy.

Our commitments

We are committed to conducting our business in a socially and environmentally responsible manner.

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict within the Democratic Republic of Congo or adjoining countries.

We are committed to transparency and accountability in our reporting on Conflict Minerals.

We expect our suppliers to share our commitment and to adopt policies and procedures that ensure the responsible sourcing of minerals.

We encourage all our stakeholders to report concerns and violations with respect to our Conflict Minerals practices. Any potential violation can be reported through our whistle blower system.

Our measures

We work according to a "Conflict Minerals Compliance Program" to review the use of Conflict Minerals and to be in a position to fulfil our reporting obligations and respond to customer inquiries. This program was developed based on the OECD 5 steps Due Diligence Framework (Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas).

We are engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance.

We analyze our supply chain of Conflict Minerals and work to continuously improve the quality of the reports we receive from our suppliers which form the basis for reporting.

We are encouraging our suppliers to implement a policy regarding Conflict Minerals and exercise due diligence to investigate and ensure responsible sourcing of these minerals.

We are also gathering information on our mineral supply chain according to the scope of EMRT (Extended Minerals Reporting Template).

In addition to tracking our sources for tantalum, tin, tungsten, and gold, we are expanding our scope to cover the use of cobalt, mica, copper, graphite, lithium and nickel.

Our purchasing terms and conditions reflect this policy.

Policy review

We will conduct regular reviews and updates of our policy to ensure it remains aligned with evolving regulations and incorporates insights gained from our ongoing compliance efforts.