

# Supply Chain Policy for Conflict Minerals





The principles defined in the **code of conduct of Treibacher Group** - of which Tribotecc GmbH is a member - are also reflected in our long-term cooperative relationships and partnerships with our suppliers. Accordingly, sustainable development along our supply chain is very important to us. For this reason, the Treibacher Group's management has decided to establish the following supply chain policy for the procurement of conflict minerals.

Whenever possible, the Treibacher Group will take a multiple sourcing approach to raw material procurement. This reduces supplier dependency and increases flexibility and availability. The Treibacher Group has established the objective of establishing long-term cooperative relationships and partnerships and to continually expand its procurement base.

We, the Treibacher Group, want to work with our suppliers to enhance their contribution to sustainability along our supply chain. Our Code of Conduct for Suppliers describes our expectations of suppliers in terms of their environmental, social and governance management policies. We have implemented obligations contained in the EU Conflict Minerals Regulation (2017/821), which sets out supply chain due diligence requirements for importers and processors of tin, tantalum and tungsten, their ores and gold originating from conflict-affected and high-risk areas (CAHRAs). The Treibacher Group sources a wide range of mineral raw materials that are required for the manufacture of products for our customers from a wide variety of industries.

The Treibacher Group is committed to ensuring that human rights are respected and business ethics are observed in relation to the extraction, trade, handling and export of minerals from CAHRAs. Therefore, the Treibacher Group has adopted this Responsible Mineral Sourcing Policy and has committed to communicating it to suppliers as a common reference point for conflict-sensitive sourcing practices with the objective of promoting their risk-awareness. In all cases, this is in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.

In addition, the Treibacher Group undertakes to avoid all minerals that pose a risk of contributing to the harms listed in Annex II of the OECD Guidance:

-  The Treibacher Group undertakes to refrain from any action that contributes to the financing of conflicts and undertakes to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.
-  Under no circumstances will the Treibacher Group tolerate, profit from, contribute to, assist with or facilitate the following actions carried out by any party:
  - Any form of torture, cruel, inhumane and degrading treatment;
  - Any form of forced or compulsory labour, child labour and slavery;
  - Other serious human rights violations and abuses, such as sexual violence;
  - War crimes or other violations of international humanitarian law, crimes against humanity, or genocide.
-  The Treibacher Group does not tolerate any direct or indirect support of non-state armed groups through mining, transportation, trade, transshipment or export of minerals.
-  The Treibacher Group undertakes to refrain from any direct or indirect support of public or private security forces that illegally control mining sites, transport routes and upstream actors in the supply chain; illegally demand levies, extort money or minerals at points of access to mining sites, along transport routes or at transshipment points; or illegally tax or extort intermediaries, export companies or international traders.

- ⬮ The Treibacher Group will not offer, promise, give or demand bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals or to misrepresent taxes, fees and charges paid to governments for the purposes of mineral extraction, trading, handling, transportation and export.
- ⬮ The Treibacher Group will support any and all efforts, or will take steps, to contribute to the effective elimination of money laundering where there is a reasonable risk of money laundering as a result of or in connection with the mining, trade, transshipment, transportation or export of minerals derived from illegal taxation or extortion at points of access to mining sites, along transportation routes or at transshipment points for upstream suppliers.

In order to ensure compliance with the obligations described above, the Treibacher Group will procure conflict minerals exclusively from RMI-listed producers or from producers who can present a valid CMRT. If the direct supplier (e.g. dealer) is not the producer itself, the producer must be named specifically in the purchase contract. If the producer is not RMI-listed but submits a valid CMRT, additional contractual agreement will be concluded to implement the Treibacher Group's requirements.

Appropriate measures will be taken immediately should the Treibacher Group identify one of the risks described above in the supply chain.

If you have any concerns about unlawful conduct or misconduct, please contact the appropriate Compliance Hotline, which is available at the following link:

[TT\\_Conflict\\_minerals@tribotecc.com](mailto:TT_Conflict_minerals@tribotecc.com)

Nothing in this document may be construed or applied in a manner that violates any applicable laws or regulations.

This document does not constitute a contract or create any contractual obligation or other rights (express or implied) or form the basis of any cause of action or legal proceedings for or by any third party.

**YOU are part of this supply chain – the Treibacher Group is counting on your commitment!**