



Conflict Minerals Policy

Wieland Group

Version 1.0, Valid from 04/09/2021

Introduction and Background

We as Wieland Group take our responsibility on due diligence along the supply chain very seriously. In addition to our Supplier Code, we have defined expectations on responsible business conduct for the procurement of conflict minerals.

Already in 2010, US legislators defined “conflict minerals” as substances that are financing armed conflicts in specific regions. Since then, various definitions for “conflict minerals” have emerged. They usually entail the working conditions, social and environmental standards, and high political risks (e.g., corruption) in the affected areas or countries.

Currently, tantalum, tin, tungsten, their ores (cassiterite, columbite-tantalite and wolframite) and gold, also known as “3TG”, are referred to as conflict minerals.

In 2012 the United States Securities and Exchange Commission (“SEC”) passed the “Conflict Minerals Rule” to issue a final legislative framework on 3TG. The EU Conflict Minerals Regulation of the European Commission came into effect in January 2021. Both legislations are now relevant for 3TG.

In this context we emphasise that we strictly follow the EU Conflict Minerals Regulation as well as other applicable legislations relating to conflict minerals. The Wieland Group adheres to an integrated managerial risk-based approach which relies on the five steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA).

We expect our business partners to take similar efforts to comply with the relevant provisions and requirements.

In any confirmed case of violation against the expectations outlined in this policy, we will take adequate measures.

Expectations

Safeguarding human rights along the supply chain is of essential importance to our business conduct. In this context we have outlined a set of specific minimum requirements that need to be fulfilled as the very foundation of our business relationship. Such minimum requirements have been outlined in our Supplier Code already and are covering principles on human rights and environmental protection.

With respect to 3TG we refer to the CAHRA-list published by the EU Commission as a basis for our conflict-affected and high-risk area classification assessment.

Business partners that are either directly or indirectly sourcing from, or even have own extraction or processing sites within one of the listed areas, are classified as risky.

In that regard we consider compliance verifications issued by the Responsible Minerals Initiative (RMI) or comparable sustainability initiatives as essential tools to reduce risks in our supply chain.

The RMI is a well-known initiative with special focus on social and environmental standards in mineral and metal

supply chains. We recognise the standards of this initiative and accept smelters and refiners that have successfully completed the RMI assessment.

We strongly prefer working with business partners, whose (production) sites are either RMI compliant themselves or mainly source directly or indirectly from smelters or refiners listed on the RMI's conformant or active lists. In this case, we consider them to be "conflict-free", even if the mining or processing sites are located in a CAHRA. Therefore, we expect all business partners to provide the Conflict Minerals Reporting Template (CMRT), developed by the RMI.

Beyond that, we reserve the right to engage in further screening of any business partner that is related to 3TG.

Furthermore, we have defined additional No-Go criteria that are in no way acceptable to us. Such No-Go criteria are defined as confirmed cases in which the following abuses systematically occur:

- Child labour prohibited by ILO Convention 182.
- Forced and compulsory labour.
- Serious abuses and fatal treatment of workers life and limb, including human trafficking and hazardous working conditions.

We welcome any information regarding violations against the No-Go criteria.

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