

## Supply Chain Policy for Conflict Minerals

The principals defined in our quality policy as well as in our code of conduct are also reflected in our long-term cooperations and partnerships with our suppliers. Sustainable development in our supply chains is a matter of concern for us. Due to this fact we decided to establish the following supply chain policy for the procurement of conflict minerals.

We are targeting long-term cooperations and partnerships as well as the expansion of the procurement basis. We want to co-operate with our suppliers to develop their sustainability performances in our supply chain. We expect our suppliers to comply with our Code of Conduct as well as with the sectors environment, social and corporate governance.

We have implemented the obligations under the EU Conflict Minerals Regulation (EU) 2017/821 which defines the due diligence along the supply chain for importers and processors of Tin, Tantalum and Tungsten, Gold and their ores from conflict and high-risk areas (CAHRAs). Our suppliers are required to inform us immediately in case of any changes in their sources of supply as well as to provide assistance.

We respect human rights and business ethics when extracting, trading, handling and exporting minerals from CAHRAs. To foster the risk awareness of the suppliers, WHS takes over these guidelines for responsible procurement of minerals and signs up to communicate this as a common reference for conflict sensitive procurement practices. Always in accordance with the OECD guidelines to fulfill the due diligence and to support responsible supply chains for minerals from CAHRAs.

We further undertake to avoid all those minerals that involves the risk to contribute to the damages listed in annex II of the OECD guidelines.

We refrain from any action that contributes to the financing of conflicts and oblige to comply with relevant sanctions resolutions of the United Nations or, if necessary, domestic laws implementing those resolutions.

We will not accept, benefit from, participate in, help or support in any action taken by any party:

- any form of torture, cruel, inhuman and degrading treatment
- any form of forced, compulsory and child labor as well as slavery
- other serious violations of human rights and abuses, such as sexual violence; war crimes or other violations of humanitarian law of nations; crime against humanity or genocide.

We do not tolerate direct or indirect support of non-governmental armed groups through mining, transport, trade, handling or export of minerals.

We oblige to refrain from any direct or indirect support of public or private security forces, who illegally control mine sites, transport routes and upstream actors in the supply chain, illegally demand taxes, extortion or minerals at access points to mine sites along the transport routes or at the trade points, or illegally tax or blackmail intermediaries, export companies or international traders.

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We will not offer, promise, hand over or demand bribes and defy the solicitation of paying bribes to hide 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.

We will support any efforts or take steps to contribute to an effective elimination of money laundering where there is a justified risk of money laundering as a result of or in connection with mining, trading, handling, transport or export of minerals, which come from illegal taxation or blackmail at access points to mine sites, along the transport routes or at the trade points of upstream suppliers.

To secure the above mentioned obligations, WHS obtains Tantalum and Tungsten exclusively from manufacturers listed by RMI respectively from manufacturers who can provide a valid CMRT or can substantiate the origin equally.

Should WHS determine an above-described risk in the supply chain, appropriate steps will be taken immediately.

In case that you have any concerns about illegal or inappropriate behaviour please get in contact with our Quality Management Officer who can be reached at the following email address: [qmb@whs-sondermetalle.de](mailto:qmb@whs-sondermetalle.de)

Nothing in this document may be interpreted or applied in a manner that defies applicable law.

This document neither constitutes a contract nor creates a contractual obligation concerning other (explicitly or silently) rights or provides the basis of a cause of action or a legal proceeding for or by a third party.

Grünsfeld, July 20<sup>th</sup>, 2022

signed by  
Herbert Seidemann  
managing director