CTDI Europe's Conflict Minerals Policy

Policy on responsible sourcing of conflict minerals

Our Contribution

CTDI Europe assumes its corporate responsibility and thereby creates the prerequisites for the sustained success of the company. In doing so, transparency is a decisive factor for trust and successful cooperation. Basis for this is the groupwide Code of Business Conduct and the Supplier Code of Conduct.

CTDI Europe has the aspiration to itself and its suppliers that all products and spare parts CTDI Europe uses for its services are free of conflict minerals, sourced from entities, which directly or indirectly finance conflicts in the Democratic Republic of Congo, or surrounding countries and from mining operations in conflict-affected and high-risk areas.

According to the EU Regulation 2017/821 of 17 May 2017, this includes areas in a state of armed conflict or fragile post conflict as well as areas witnessing weak or non-existent governance and security. It also affects states that systematically violate international law, including human rights abuses. The term "conflict minerals" is defined as 3TG - gold, tantalum, tin, tungsten, and any other mineral defined by regulations applicable to the sourcing of conflict minerals.

In addition, CTDI Europe is guided by the worldwide requirements and guidelines regarding the sourcing of conflict minerals as with Dodd Frank Act Section 1502.

While CTDI Europe does not directly purchase those minerals from any source, it is aware of the possibility that conflict minerals may be part of the supply chain. In recognition of this, CTDI Europe's goal is to source these minerals responsibly by integrating the "OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas" in its group processes.

Expectation

To support CTDI Europe and its customers to comply with the applicable rules and regulations for the sourcing of conflict minerals, CTDI Europe expects its suppliers to fulfil their due diligence obligations along the supply chain with regard to conflict minerals and to submit reports, documentation or written assurances on request.

In detail it means following expectations towards suppliers:

- ❑ Comply with the OECD Due Diligence Guidance 5 step framework
- ❑ Report regarding the presence and source of minerals using the RMI Conflict Minerals Reporting Template (CMRT) for 3TG and Extended Minerals Reporting Template (EMRT) for other minerals as applicable.
- ❑ Use smelters and refiners that are validated as conformant by the Responsible Minerals Assurance Process (RMAP) or recognized equivalent audit programs. RMI conformant smelters list can be found here.
- ❑ Conduct origin inquiries into the countries of mineral origin and associated risks using

RMI resources like the Global Risk Map.

CTDI Europe proceeds a responsible pre-selection of suppliers. As a supplier selected to be relevant, CTDI Europe insists to receive a reply about using conflict minerals, without any exemptions. A missing answer from the supplier side may lead to further measures or even to a renunciation of the future cooperation.

CTDI Europe also strongly encourages suppliers to:

- Support the EU Conflict Minerals Transparency Platform to foster industry-wide improvements.
- Report any grievances related to mineral sourcing through recognized grievance mechanisms such as the RMI Grievance Mechanism.
- Conduct annual public reporting on our conflict minerals due diligence measures via your website and/or the EU Transparency Platform.
- Participate in the Downstream Assessment Program (DAP) or equivalent recognized programs.

Validity

This policy is valid as of 17.07.2026 and replaces the former policy from 17.01.2025.

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