



## Supply Chain Policy for Conflict Minerals

The principles defined in the Wolfram Industrie's CODE OF CONDUCT reflect our expectations for long-term cooperation and partnerships with our suppliers. Ensuring the principles of sustainable development in our supply chain is important to us.

For us, sustainability means compulsory compliance with the expectations in our Code of Conduct and fulfilling obligations under the EU Conflict Minerals Regulation (2017/821), which sets out the supply chain due diligence requirements for importers and processors of tin, tantalum and tungsten, gold and their ores from conflict and high-risk areas (CAHRAs)

Wolfram Industrie is committed to support and contribute to the respect of human rights and ethics in business. Considering this and other risks that may be connected to the extraction, trading, handling and exporting of minerals from CAHRAs, Wolfram Industrie adopts this Policy in responsible sourcing of minerals.

In alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs this policy is intended to serve as a common reference for our suppliers for conflict-sensitive sourcing practices and to promote risk awareness.

Wolfram Industrie is committed to avoid minerals that may pose a risk of contributing the harms listed in Annex II of the OECD Guidance:

- We commit to refrain from any action that contributes to the financing of conflicts and we commit to comply with the relevant United Nations sanctions resolutions or, where applicable, with national laws implementing these resolutions.
- We will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
  - any form of torture, cruel, inhuman degrading treatment;
  - any form of forced or compulsory labor, 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.
- We do not tolerate any direct or indirect support of non-state armed groups through mining, transportation, trade, transshipment or export of minerals.
- We agree to eliminate direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.



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- We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trading, handling, transport and export.
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In case Wolfram Industrie identifies a reasonable risk described above in our supply chain, appropriate actions will be taken immediately.

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

**[mail.compliance@wolfram-industrie.de](mailto:mail.compliance@wolfram-industrie.de)**

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 (ex-press 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 –  
Wolfram Industrie is counting on your commitment!**