

Conflict Minerals Due Diligence Policy

V05 / 25.06.2025

Dear Valued Business Partner,

The MENNEKES Group – hereinafter referred to as MENNEKES – is committed to a transparent supply chain in which human rights and environmental standards are upheld (hereinafter referred to as a “conflict-free supply chain”). MENNEKES fully supports the objectives of the U.S. Dodd-Frank Act and the EU Regulation (EU) 2017/821 on conflict minerals¹. This pertains to the due diligence obligations for the responsible sourcing of 3TG minerals, as well as the raw materials cobalt, mica, copper, natural graphite, lithium, and nickel.

Objective

MENNEKES condemns any activity that causes violence, human rights violations, or negative environmental impacts. By creating and implementing a due diligence policy on conflict minerals, MENNEKES aims to identify, disclose, prevent, mitigate, or remedy actual and potential risks. This is a continuous and reactive process that can be improved over time.

Please note:

- MENNEKES does not purchase conflict minerals directly from any conflict region.
- MENNEKES is committed to avoiding the procurement of products that contain raw materials whose sale directly or indirectly finances or benefits armed groups in conflict-affected and high-risk areas.
- MENNEKES expects its suppliers to source minerals only from conflict-free sources and relies on the information provided by its suppliers.
- The Conflict Minerals Due Diligence Policy is available at:
<https://www.mennekes.de/unternehmen/ueber-uns/nachhaltigkeit/gesetzliche-vorgaben-verpflichtungen/>

¹ Legislation on conflict minerals:

US: Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502

EU: Verordnung (EU) 2017/821 des Europäischen Parlaments und des Rates, 17. Mai 2017

Definition of Conflict Minerals²

Conflict minerals (more broadly: “conflict resources” or “conflict commodities”) are goods such as raw materials or natural resources that are often extracted illegally and without government oversight in conflict regions and high-risk areas. These activities are frequently associated with systematic human rights and international law violations. Therefore, this is a matter of Corporate Social Responsibility (CSR) and corporate due diligence.

Specifically, conflict minerals refer to tin, tungsten, tantalum, and gold – collectively known as **3TG**, based on their English names: tin, tungsten, tantalum, and gold. The ores of these raw materials include cassiterite (tin ore), wolframite (tungsten ore), and coltan (tantalum ore). These ores are particularly used in electronic devices such as computers and mobile phones.

Due Diligence System

Based on the OECD (Organization for Economic Cooperation and Development) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas³, MENNEKES has established a process to contribute to transparency in the supply chain.

This includes the following steps:

- Annual review of the supply chain (relevant, direct suppliers) regarding the sourcing of raw materials from smelters and refiners in conflict and high-risk areas
- Evaluation of results and preparation of internal reporting documents for downstream companies
- Communication of expectations to eliminate non-compliant or high-risk smelters and refiners from the supply chain
- Reporting to the RMI (Responsible Minerals Initiative) about incorrect information in the returned “Smelter List”
- Continuous monitoring of supplier feedback, especially in cases of discrepancies (e.g., sourcing from non-compliant sources) or poor/missing communication
- Updating of reporting documents in the event of significant changes

² <https://www.imds-professional.com/en/conflict-minerals/>

³ https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html

Reporting Documents

The two official reporting templates are defined as follows:

„The Conflict Minerals Reporting Template (**CMRT**) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized.“⁴

„The Extended Minerals Reporting Template (**EMRT**) is a free, standardized reporting template developed by the Responsible Minerals Initiative to identify pinch points and collect due diligence information in the cobalt and mica supply chains.“⁵ As of April 2025, the template has been expanded to include copper, natural graphite, lithium, and nickel.

MENNEKES expects its business partners to provide honest and transparent disclosure of information, especially regarding the origin of raw materials. As long as the data has been compiled to the best of the supplier's knowledge and belief, MENNEKES has no reason to doubt the accuracy of the information received.

Smelters and Refiners

As part of the annual supply chain inquiry process, MENNEKES requests its suppliers to remove non-compliant or high-risk resources from the supply chain. The majority of suppliers refer to their own responsible sourcing policies and confirm their willingness and support in implementing a conflict-free supply chain. Due to the complexity and multi-layered nature of supply chains, significant human and time resources are still required to carry out this process and achieve the defined objectives.

- **Non-Compliant Smelters**

Some smelters and refiners are not yet compliant with the RMAP⁶ (Responsible Minerals Assurance Process). However, MENNEKES does not automatically consider them “high-risk” solely because they have not yet been audited.

As a downstream company, MENNEKES has neither influence nor control over these smelters and their use.

- **Inactive Smelters**

Since closure dates vary significantly and inventories can remain in the supply chain for extended periods, inactive smelters and refiners are often still reported in the templates. MENNEKES assumes that many of these facilities will soon be removed from the RMI templates.

⁴ <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>

⁵ <https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/>

⁶ <https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/>
<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/standards/>

We sincerely appreciate your cooperation and partnership,

MENNEKES Elektrotechnik GmbH & Co. KG

25.06.2025

Reference Documents

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

https://www.oecd.org/en/publications/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_9789264252479-en.html

OECD Handbook on Environmental Due Diligence in Mineral Supply Chains

https://www.oecd.org/en/publications/handbook-on-environmental-due-diligence-in-mineral-supply-chains_cef843bf-en.html

Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas

<https://eur-lex.europa.eu/eli/reg/2017/821/oj/eng>

Indicative, non-exhaustive list of conflict-affected and high-risk areas under Regulation (EU) 2017/821

<https://www.cahaslist.net/cahas>

Indicators & Facility Lists by Metal

<https://www.responsiblemineralsinitiative.org/facilities-lists/indicators/>