

*Note: For reasons of better readability, the generic masculine form is used in this document for references to persons and nouns relating to persons. It is expressly pointed out here that the corresponding terms apply to all genders.*

## Procurement Policy for Conflict-Free Minerals

### 1 Background and Context

- (1) In various countries, particularly the Democratic Republic of Congo and neighboring countries, the proceeds from the mining of conflict minerals are used to directly or indirectly finance armed conflicts. The term "conflict minerals" refers to gold, tantalum, tin, tungsten (3TG) and all other minerals defined as such in applicable regulations on the procurement of conflict minerals.
- (2) The mining of these minerals is associated with significant human rights violations. Legal frameworks and global initiatives have therefore been created to prevent the use of conflict minerals. The legal basis for this is the US Dodd-Frank Act. Section 1502 of this Act contains requirements and guidelines that have resulted in global legal adjustments. These operating regulations are an integral part of the contract and are therefore binding.
- (3) According to EU Regulation 2017/821 of 17 May 2017 on curbing the trade in conflict minerals, minerals from other conflict and high-risk areas are also considered regulated conflict minerals. This also includes areas where armed conflict is ongoing or which are in a weakened situation following conflict, as well as areas with weak security structures. States that systematically violate international law, including human rights violations, are also affected.

### 2 Introduction

- (1) ESKA Automotive GmbH is committed to responsible and ethical procurement practices. ESKA develops fasteners and formed parts with a focus on complex and critical components and applications.
- (2) To this end, we are responsible for ensuring that human rights are respected and sustainability is promoted in our supply chain. This policy serves to ensure that all minerals we procure are conflict-free and meet the highest ethical standards. Please inform yourself as a contractor about the regulations that are relevant for your work/activities before you and any subcontractors begin work/activity on the premises of the respective ESKA® site.

### 3 Objective

- (1) The objective of this policy is to ensure that ESKA only sources minerals that do not contribute to the financing of armed conflict, human rights abuses or other illegal activities. This policy applies in particular to tin, tantalum, tungsten and gold, which are referred to as "conflict minerals".
- (2) This policy is supplemented by responsible sourcing of so-called "extended conflict minerals" – cobalt, copper, graphite, lithium, mica and nickel.

### 4 Scope

This policy applies to all suppliers and subcontractors who directly or indirectly supply minerals to our company, including as components of raw materials or surface coatings.

### 5 ESKA's Obligations

#### Due Diligence

We conduct a thorough review of our suppliers to ensure that all minerals come from conflict-free sources. The aim is to ensure that all raw materials used in ESKA products are as conflict-free and traceable as possible, in accordance with the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

#### Transparency

We require our suppliers to disclose the origin of the minerals they supply and to prove that they do not originate from conflict areas. Suppliers must provide us with the relevant documentation upon request.

#### Training and Awareness

We regularly train our employees in procurement and affected departments on the importance of conflict-free minerals and ensure that all relevant departments are aware of the requirements of this policy.

## 6 Obligations to our Suppliers

- (1) Not to purchase any products or materials containing conflict minerals directly from conflict mines.
- (2) To provide complete reports on request documenting the presence and origin of materials from legitimate sources using the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (**CMRT**) and Extended Mineral Reporting Template (**EMRT**).
- (3) To source materials from smelters that have been declared "compliant" or at least "active" by RMI audit protocols or mutually recognized audit protocols, and to comply with EU Regulation 2017/821, as well as
- (4) Report conflict-affected smelters immediately upon becoming aware of them and exclude them from the supply chain without delay.

## 7 Responsibility and Monitoring

ESKA's procurement and relevant departments are responsible for implementing and monitoring this policy. They review the policy at regular intervals to identify potential risks in the supply chain.

## 8 Reporting

This policy is published on our company website and is part of our commitment to transparency and sustainability.

## 9 Consequences of Non-Compliance

- (1) Feedback regarding the use of conflict minerals is mandatory for all ESKA suppliers without exception.
- (2) Suppliers who are unable to meet the requirements of this policy will be asked to take corrective action. Otherwise, ESKA reserves the right to terminate the business relationship.
- (3) We are committed to working in partnership with our suppliers and support them in taking the necessary steps to comply with this policy.

## 10 Contact Information

For further information or questions regarding this policy, please contact our procurement department at [conflictminerals@eska.net](mailto:conflictminerals@eska.net).

Chemnitz, 29 April 2026