



Policy on Conflict Minerals and Responsible Sourcing

Isabellenhütte Heusler GmbH & Co. KG is aware of its responsibility regarding human rights, ethical behavior and environmental protection in the global supply chain. To ensure transparent and responsible sourcing in our own supply chain, we comply with the requirements of Regulation (EU) 2017/821, Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act and the OECD Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We are committed to avoiding the sourcing of raw materials or the transfer of products containing conflict minerals - in particular tantalum, tin, tungsten and gold - whose extraction is associated with the financing of armed conflicts or human rights violations in Conflict Affected and High-Risk Areas (CAHRA), including the Democratic Republic of Congo (DRC) or neighboring countries.

To implement our due diligence obligations in relation to conflict minerals, we use the standardized reporting formats of the Responsible Minerals Initiative (RMI) to systematically record information on the origin of the minerals used and on the smelters or refineries involved in the supply chain. For the above-mentioned conflict minerals, we document in the Conflict Minerals Reporting Template (CMRT) that we only use raw materials that are RMI-compliant and come from conflict-free refineries and smelters.

We require our suppliers to update their information on conflict minerals once a year and to provide us with a complete CMRT of the RMI in order to demonstrate their compliance with the above-mentioned guidelines and requirements.

The timeliness and completeness of this information is a key criterion in our risk assessment and determines the continuity of business relationships with our suppliers. We are endeavoring to expand our due diligence process for other raw materials and minerals and rely on close cooperation with our business partners.

We aim to ensure a conflict-free supply chain and the implementation of responsible raw material sourcing along our entire value chain. To this end, we will continue our annual supplier review of conflict minerals and request an update of the origin data on an ongoing basis.

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