

Conflict Minerals Policy

At VAT Group AG and its subsidiaries (“VAT”), we are committed to upholding ethical business practices and promoting responsible sourcing throughout our supply chain. As part of this commitment, we have developed the following Conflict Minerals Policy to ensure that the minerals used in our products do not finance or contribute to armed conflicts or human rights abuses (“conflict minerals”).

We follow a process that is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This includes establishing compliance requirements for our direct suppliers regarding conflict minerals, implementing controls and reporting, undertaking appropriate sourcing efforts, and providing our customers the data necessary to facilitate their SEC reporting on conflict minerals as defined in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

VAT is committed to ensuring sustainable sourcing of all raw materials in its supply chain. VAT’s suppliers are required to only source smelters and refiners (“Smelters”) in VAT’s supply chain that source from a safe and responsible source and/or if the Smelter is classified “conflict-free” by an independent, third-party organization such as the Responsible Business Alliance Conflict Mineral Initiative.

VAT will align its efforts to practices established by industry peers – including the Responsible Business Alliance (RBA) – to enable companies to source conflict-free minerals.

Declaration of intent

VAT declares its commitment to avoiding the use of conflict minerals in our products and supply chain. We are dedicated to promoting peace, stability, and human rights in the regions where these minerals are sourced. We support the global efforts to end violence and atrocities in Central Africa (the Democratic Republic of Congo (DRC) and its nine adjoining countries (Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda) as well as other Conflict Affected and High-Risk Areas (CAHRAs) as defined under Regulation (EU) 2017/821 that are particularly vulnerable to human rights violations due to ongoing conflicts and unstable governments. In addition, VAT is committed to not sourcing from smelters that are sanctioned or otherwise directly associated with human rights violations, regardless of geographic location.

This policy applies to conflict minerals (gold, tin, tantalum, and tungsten) as well as extended conflict minerals (MICA, cobalt), and any derivatives or by-products, sourced from regions recognized as conflict-affected or high-risk areas.

Responsible Sourcing

VAT is committed to sourcing minerals only from suppliers that comply with international standards and guidelines for responsible mineral sourcing. We will prioritize working with certified mines and smelters to ensure transparency and ethical practices.

Risk Assessment

We will assess the risk of conflict minerals entering our supply chain by identifying the most critical parts and working in close contact with the associated supplier. Based on this assessment, we will take appropriate measures to mitigate the identified risks.

Supply Chain Due Diligence

We will conduct thorough due diligence across our supply chain to identify the presence of conflict minerals. This includes engaging with our suppliers to obtain information about the origin of minerals used in our products.

Supplier Requirements

We expect all our suppliers to adhere to this Conflict Minerals Policy and to cooperate with us in our due diligence efforts. Suppliers must confirm the source of minerals and commit to responsible sourcing principles.

Reporting and Transparency

We will provide regular reports on our conflict minerals compliance efforts by providing the Conflict Mineral Reporting Template (CMRT) and the Extended Conflict Minerals Reporting Template (EMRT) to our relevant stakeholder. In addition we provide updates, including progress made in responsible sourcing and steps taken to address identified risks, as part of our annual sustainability report. Our stakeholders will have access to this information to ensure transparency.

Training and Communication

We will provide our employees and suppliers with the necessary training and resources to understand and comply with this policy. Effective communication channels will be established to address concerns and foster a culture of responsible mineral sourcing.

Continuous Improvement

We will provide our employees and suppliers with the necessary training and resources to understand and comply with this policy. Effective communication channels will be established to address concerns and foster a culture of responsible mineral sourcing.

References and Revision history

Version: 1.1;

Approved by the Group Executive Committee (GEC)

23.05.2024

Appendix:

Code of Conduct of VAT Group AG
Responsible Business Alliance (RBA)