



TIBCHEMICALS

Supply Chain Policy

Responsible procurement of 3TG-material

Status: February 2024

The Board of Directors adopted the following policy statement on responsible sourcing of Conflict Minerals at TIB Chemicals AG in April 2023:

A. PREAMBLE

- (1) We take responsibility in sourcing metals or minerals from conflict and high-risk areas in accordance with Annex II of the OECD Due Diligence Guiding Principles to Promote Responsible Supply Chains for Minerals from Conflict and High-Risk Areas (second edition, OECD, 2013) and Regulation (EU) 2017/821 of the European Parliament and of the Council establishing supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict and high-risk areas of 17th March 2017 ("Conflict Minerals Regulation").
- (2) We particularly do not tolerate the procurement of ores and metals containing or consisting of tin, tantalum, tungsten, or gold ("conflict minerals"), if
 - (a) in the course of the mining and transportation of, or trade in, conflict minerals in our supply chains
 - i) torture or cruel, inhuman or degrading treatment occurs;
 - ii) people are used for forced labor;
 - iii) child labor or worst forms of child labor occur;
 - iv) other serious human rights violations and abuses occur, such as sexual violence;
 - v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide are committed.
 - (b) there is direct or indirect support of non-State armed groups in connection with the mining, transportation, trade, transshipment, or export of the conflict minerals;



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- (c) the mining, transportation, trade, transshipment or export of conflict minerals involves or is supported by public or private security forces that unlawfully exercise control over mining sites, transportation routes and upstream actors in the supply chain, unlawfully demand levies, extortion money or the surrender of conflict minerals at points of access to mining sites, along transportation routes or at transshipment points, or unlawfully tax or extort intermediaries, exporting companies and international traders.
 - (d) when bribes are offered, promised, given, or demanded to conceal or disguise the origin of conflict minerals or to misrepresent taxes, royalties, or license fees paid to the government for the purpose of mineral extraction, trade, transshipment, transportation, or export.
- (3) We cooperate in the effective combating of money laundering where there is a reasonable risk of money laundering as a result of, or in connection with, the mining, trading, transshipment, transportation or export of conflict minerals obtained through unlawful taxation or extortion at access points to mining sites, along transportation routes or at transshipment points of upstream companies.

B.

PRINCIPLES GOVERNING THE IMPORT OF CONFLICT MINERALS INTO THE EUROPEAN UNION

We observe the following principles when importing conflict minerals and products containing conflict minerals into the European Single Market:

- (1) Conflict minerals contained in the products must originate from smelters that are not located in conflict or high-risk areas (conflict-affect and high-risk areas – CAHRAs). In assessing which areas are CAHRAs, we take into account the indicative and non-exhaustive list of conflict and high-risk areas under the Conflict Minerals Regulation prepared by Rand Europe on behalf of the European Commission (<https://www.cahraslist.net>).
- (2) When selecting our suppliers, we evaluate whether the supplier
 - (a) submits reports on third-party audits of smelters from which it sources Conflict Minerals and whether the reports comply with the requirements of Article 6(1) of the Conflict Minerals Regulation,
 - (b) if this is not the case: provide records of the countries of origin of the conflict minerals; and,
 - (c) if the smelters source conflict minerals from conflict and high-risk areas, provides additional information in accordance with the specific recommendations for



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downstream operators in the OECD Due Diligence Guidelines for Promoting Responsible Supply Chains of Minerals from Conflict and High-Risk Areas.

- (3) As soon as the European Commission establishes a worldwide list of names and addresses of responsible smelters and refiners, as it is instructed to do in Art. 9 para. 1 of the Conflict Minerals Regulation, we will additionally assess, when selecting suppliers, whether the suppliers source the products ordered or the conflict minerals processed therein from responsible smelters and refiners.

C. COMPLIANT MECHANISM

TIB Chemicals AG has established a complaints mechanism that is accessible to everyone. This mechanism is managed jointly with Moore TK Tech GmbH. This company has been commissioned by us to ensure that complaints are processed impartially. You can view the contact details of Moore TK Tech GmbH directly on our reporting portal.

The complaints mechanism is set up as an online portal and can be accessed at:

<https://whistleblowersoftware.com/secure/TIB-Chemicals-AG-Whistleblowing-Channel>

The mechanism acts as an early warning system for risk identification, enabling all interested parties, including whistleblowers, to raise concerns about the circumstances of mineral extraction, trade and handling of these minerals in conflict-affected and high-risk areas and their export from conflict-affected and high-risk areas where they affect the TIB Chemicals AG's supply chains.

D. MISCELLANEOUS

- (1) Upon request, we provide our customers with the information that we are able to obtain in the course of fulfilling our statutory due diligence obligations in the supply chain and to disclose while maintaining the required confidentiality.
- (2) The procurement policy does not create any rights of third parties.

Mannheim, February 2024

Dr. Michael Grün
Chief Executive Officer TIB Chemicals AG