

**Declaration**  
**International Trade Compliance**

At KME Group, we are committed to complying with all applicable export control laws and trade regulations, both domestic and international, with a particular focus on those of the European Union (EU) and/or the United States (US). We believe that compliance with these laws and regulations is fundamental to our identity as a responsible and reliable business partner, enabling us to build lasting and trustworthy relationships in the global market.

In line with the above commitment and in alignment with our Code of Conduct, KME SE's subsidiaries supply semi-finished products from copper and copper alloys, while actively identifying, managing, and minimizing risks associated with their import/export operations and commercial activities.

Our commitment to trade compliance includes:

- ensuring that all products are accurately classified according to relevant legislation to determine and apply the correct requirements;
- avoiding business activities or any direct or indirect dealings in, or with the government of, any country or territory under a total trade embargo or comprehensive sanctions or with any other individuals or entities targeted by economic sanctions adopted, administered or enforced by the United Nations Security Council, the EU, the US Government, Her Majesty's Treasury, or any other relevant sanctions authority, unless such business or dealing is explicitly permitted by law or licenses from relevant authorities;
- screening business parties, including suppliers, agents, distributors, and customers, to ensure compliance with applicable trade laws and regulations;
- implementing regular education and communication programs for relevant personnel to promote awareness and understanding of trade compliance obligations;
- keeping accurate and complete records of all transactions and activities related to international trade, as legally required;
- encouraging all personnel to seek guidance on export-related issues and situations that may implicate export control and sanctions laws as well as to report any knowledge, awareness, or reasonable suspicion of a potential violation of trade laws or regulations;
- promptly reporting any suspected violations of trade laws or regulations to the appropriate authorities and taking appropriate corrective action.

We acknowledge that trade compliance is a collective responsibility and are committed to collaborating closely with our suppliers, customers and business parties to ensure full compliance with all applicable laws and regulations.

Osnabrück, 08.11.2024

KME SE

Claudio Pinassi – Chief Executive Officer



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