

## CONFLICT MINERALS POLICY STATEMENT

At KME, we are committed to maintaining the highest ethical standards in our business practices, ensuring that our supply chain does not contribute to human rights violations, armed conflict, or environmental degradation. We recognize the importance of responsible mineral sourcing and are dedicated to transparency and accountability in our global procurement processes.

We are aware that certain minerals, including tin, tantalum, tungsten and gold, also known as "**3TG**", are sourced from regions where mining operations may finance armed groups, perpetuate conflict, and fuel human rights violations. These minerals, often referred to as "Conflict Minerals", primarily originate from the Democratic Republic of Congo (DRC) and surrounding regions (Conflict Affected and High-Risk Areas, "**CAHRAs**").

Although KME does not meet the criteria of a Union importer of minerals or metals containing or consisting of tin, tantalum, tungsten or gold – as outlined in Annex I of the **European Union Conflict Minerals Regulation** (Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017) - and primarily sources copper or secondary metals, we actively collaborate with our direct suppliers and other companies within our sector to implement and uphold our Conflict Minerals compliance policies and processes.


Driven by this commitment and guided also by the five steps of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, our program is built on the following principles:

- **Supplier Engagement:** we expect our direct suppliers to source minerals from responsible and ethical sources. Suppliers must provide documentation demonstrating their compliance with applicable regulations and are required to establish an appropriate evaluation process with their supply chain, to ensure that the specified metals are sourced exclusively from mines and foundries outside CAHRAs, or from those within CAHRAs that have been certified "Conflict Free" by an independent third party.
- **Due Diligence:** in addition to gathering the necessary information and supporting documentation regarding the minerals' origin from our direct suppliers – such as obtaining the Conflict Minerals Reporting Template ("CMRT") from the Responsible Minerals Initiative ("RMI") – we also, in proportion to the level of risk, investigate the specific circumstances involved in the extraction, transport, handling, trading, processing, smelting, refining and alloying, manufacturing or selling of products that contain minerals originating from CAHRAs.
- **Third-Party Assessment and Audits:** we support the use of third-party audits to verify smelters and refiners in our supply chain, ensuring that they are certified as conflict-free through recognized programs such as the Responsible Minerals Initiative (RMI) or comparable sustainability initiatives. In this scenario, we classify them as "Conflict Free," even if the mining or processing sites are situated in a CAHRA.
- **Continuous Improvement:** We are committed to continuous improvement in our supply chain practices, regularly reviewing and enhancing our policies, training programs, and engagement with stakeholders to mitigate risks associated with conflict minerals. In any confirmed case of violation against the expectations outlined in this statement, we will take adequate measures.

By maintaining responsible mineral sourcing practices and working closely with our customers and suppliers, we aim to promote the development of conflict-free supply chains, protect human rights, and support sustainable development in regions affected by conflicts, in alignment with KME's core values.

Osnabrück, 25.08.2025

KME SE



Claudio Pinassi – Chief Executive Officer