

Conflict Minerals Policy

Document objective

This conflict minerals policy aims to stem the trade in four minerals – tin, tantalum, tungsten and gold (3TG) – which sometimes finance armed conflict or are mined using forced labour. Gurit commits to the responsible sourcing of minerals from conflict affected areas. Gurit commits to comply with, and aims to exceed, any relevant legislation, and if legislation does not exist in a particular area, the company should ensure best practices are carried out.

Related documents

- **Gurit Sustainability Report** and the respective contents on our supply chain due diligence. Published annually online at: www.gurit.com/sustainability
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.**

Document index

Section 1 – Responsible Sourcing of Minerals	Page 1
Section 2 – Gurit commitments regarding the responsible sourcing of minerals	Page 2
Section 3 – Implementation	Page 2
Section 4 – Review, Stakeholder Feedback and Reporting Concerns	Page 2

1 – Responsible Sourcing of Minerals

Gurit recognizes the risks of significant adverse impacts which may be associated with extracting, trading, handling, and exporting 3TG **minerals from conflict-affected and high-risk areas** and we recognize that we have the responsibility to respect **human rights** and not contribute to conflict. We commit to adopt, widely disseminate, and seek to incorporate in contracts and/or agreements with suppliers the principles of this policy on responsible sourcing of minerals from conflict-affected and high-risk Areas. These binding guidelines are part of Gurit's Supply Chain Management System.

Gurit is a signatory to the United Nations Global Compact (UNGC) and as such we commit to refraining from any action which contributes to the **financing of conflict**, committing to comply with relevant **United Nations sanctions resolutions** or, where applicable, **domestic laws** implementing such resolutions.

Minerals at risk of being sourced from conflict-affected and high-risk areas in the moment of issuance do not form an integral part of Gurit products or services. However, Gurit endeavors to carry out risk-based due diligence in specific areas of purchasing where there is an identified risk to supply of such minerals according to the **UN Guiding Principles on Business and Human Rights** and the **OECD Due Diligence Guidance for Responsible Business Conduct**.

Gurit maintains a process of continuous assessment of suppliers to determine the risk of purchasing from conflict affected and high-risk areas. Where such a risk becomes apparent, action is taken to mitigate and remove such risk. The status of this policy is reported annually in Gurit's sustainability report.

2 – Commitments regarding the responsible sourcing of minerals

While sourcing materials, Gurit will not tolerate nor be party to:

- i. any form of contravention to human rights as defined in the **Universal Declaration of Human Rights**.
- ii. direct or indirect **support to non-state armed groups** through the extraction, transport, trade, handling, or export of minerals, including procuring minerals from, making payments to, or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates.

We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses or any party providing direct or indirect support to non-state armed groups as defined above.

In accordance with Gurit's Code of Conduct, Gurit policies and our Modern Slavery Statement, we will not support money laundering, bribes, illegal taxation, extortion activities specifically linked to procurement or concealment of origin of materials containing conflict minerals.


For further guidance our procurement teams and suppliers are invited to refer to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

3 – Implementation

The policy applies to all Gurit Group sites and to our Global Procurement department. The policy is implemented under the responsibility of the Chief Procurement Officer. Suppliers are identified by Gurit as potentially at risk for supplying such minerals are informed about our policy and are requested to commit to it in writing.

4 – Review, Stakeholder Feedback and Reporting Concerns

The policy is reviewed during each materiality assessment cycle in line with the Global Reporting Initiative (GRI) Standard and annually by the Chemical Regulatory Compliance Officer that recommends any updates to the Executive Committee. Stakeholders are encouraged to share concerns, complaints or observations with the Global Sustainability Team that may be contacted at: sustainability@gurit.com.

Content owner	Amy Moram, Chemical Regulatory Compliance Manager
Approver	Mitja Schulz, CEO
Date of approval	1 December 2022
Approver signature	
Date of last review	1 December 2022
Publication of most recent version of this document	www.gurit.com/sustainability