

## Safic-Alcan

### Our position on Conflict Minerals

Safic-Alcan and its subsidiaries ("Safic-Alcan") are committed to conduct their business activities in accordance with the highest legal and ethical standards. This commitment is reflected in our [Code of Conduct](#). We are also committed to source materials from suppliers that share our values, and we expect our suppliers to comply with our [Third Party Code of Conduct](#).

#### Regulatory context on the use of tantalum, tin, tungsten and gold

In addition to the U.S. Dodd Frank Act regulation, since January 1<sup>st</sup> 2021 a new regulation applies across the EU. Their objectives are to help stem the trade in tin, tantalum, tungsten and gold ("**Conflict Minerals**"), which sometimes finance armed conflict or are mined using forced labour.

The [EU regulation](#) aims to ensure that EU importers of "**Conflict Minerals**" meet international responsible sourcing standards, set by the Organisation for Economic Co-operation and Development (OECD) and that global and EU smelters and refiners of "**Conflict Minerals**" are sourcing responsibly. Consequently, it aims to break the link between conflict and the illegal exploitation of minerals and to end the exploitation and abuse of local communities, and to support local development.

The regulation requires EU companies in the supply chain to ensure they import these minerals and metals from responsible and conflict-free sources only.

#### Safic-Alcan's position on "Conflict Minerals"

Safic-Alcan does not directly purchase "Conflict Minerals" and therefore has no obligation under the EU or US regulations. However, Safic-Alcan is committed to a sustainable and responsible procurement. As such, we are willing to assist our Customers by seeking information from our Principals whether the materials that they supply to us, as a Distributor, contain "Conflict Minerals", and if so, by requiring the origin of such minerals.

Our expectations for our Principals are to supply raw materials that do not contribute to human rights abuses and to have a responsible sourcing concerning "Conflict Minerals". If applicable, they will be required to adopt conflict minerals policy and implement a management system to support compliance with their policy and require their suppliers to take the same steps.

Concerns regarding this position paper or any related potential violations may be reported directly to Safic-Alcan's local Management. If contact with local Management is not appropriate, to the Safic-Alcan Group Management or through this email address: [reporting.concern@safic-alcan.com](mailto:reporting.concern@safic-alcan.com) or online: [Reporting concern form](#).

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