

# ARGO-HYTOS Group Conflict Minerals Policy

## **Introduction**

According to our Code of Conduct (<https://www.argo-hytos.com/en/company/code-of-conduct.html>), ARGO-HYTOS strongly acknowledges social responsibility as a prerequisite for sustainable corporate success.

Consequently, ARGO-HYTOS supports the following initiatives:

- **Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act** and the related SEC rule designed to limit the flow of funds to armed groups in the Democratic Republic of the Congo (DRC) and adjoining countries from the production of conflict minerals.
- **Regulation (EU) 2017/821 of the European Parliament** and of the council of May, 17<sup>th</sup> 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

## **Definitions**

**Conflict minerals** are defined as columbite-tantalite, cassiterite, gold, wolframite, and their derivatives tantalum, tin and tungsten.

**DRC adjoining countries** are the following countries bordering the DRC: Angola, Burundi, Central African Republic, Congo Republic, Rwanda, Sudan, Tanzania, Uganda and Zambia.

## **Policy**

- ARGO-HYTOS is committed to make reasonable efforts:
  - a) to require each ARGO-HYTOS supplier to disclose, whether tin, tantalum, tungsten or gold is used or contained in its products;
  - b) to identify the source of such minerals if they are contained in the products purchased from such suppliers, and
  - c) to eliminate procurement, as soon as commercially practicable, of products containing conflict minerals from sources that fund or support inhumane treatment or armed conflicts worldwide, especially in but not limited to DRC or adjoining countries.
- ARGO-HYTOS suppliers must undertake reasonable due diligence within their supply chain to determine the chain of custody and origin of the conflict minerals. Due diligence includes developing policies and management systems to use conflict free minerals, including making these requirements apply to their direct suppliers and sub-tier suppliers and requiring them to do the same with lower tiers of suppliers.

## **Non-Compliance**

In the event that a supplier cannot or will not adhere to this policy, it is the intention of ARGO-HYTOS to limit purchases from the supplier to the extent practicable or seek alternative suppliers where commercially feasible.