

Conflict Minerals Policy

The CLAYENS Group's conflict minerals policy aims to ensure compliance with transparency obligations and imposed by its customers, particularly those subject to the requirements of the U.S. Securities and Exchange Commission (SEC) and Regulation (EU) 2017/821 of the European Parliament and Council of 17 May 2017, as well as international principles on human rights and responsible sourcing. This policy applies to all CLAYENS Group employees worldwide.

Conflict minerals refer to tin, tantalum, tungsten, and gold (3TG), or their derivatives. These resources may finance armed groups responsible for serious human rights violations and may originate from conflict-affected or high-risk areas, in accordance with the above-mentioned regulations.

CLAYENS supports responsible sourcing initiatives promoted by its customers and partners.

CLAYENS is actively committed to:

- Identifying, reducing, and eliminating, as far as possible, the use of conflict minerals originating from conflict-affected or high-risk areas.
- Using the Conflict Minerals Reporting Template (CMRT), developed by the Responsible Minerals Initiative (RMI), whenever possible, to collect and centralize supply chain data.
- Providing customers, upon request, with an updated list of smelters identified through CMRT surveys.
- Conducting regular regulatory monitoring and promoting industry best practices related to conflict minerals.
- Raising awareness among 100% of our buyers about responsible purchasing, particularly regarding conflict minerals issues.
- Raising awareness among 100% of our strategic suppliers about conflict minerals issues.

CLAYENS expects all its suppliers to commit to:

- Ensuring that 3TG come only from responsible sources, located outside conflict-affected or high-risk areas.
- Providing, upon request, a CMRT or an equivalent certified document specifying the origin of the 3TG contained in the materials or components delivered to CLAYENS.
- Immediately informing CLAYENS of any changes in the composition or sourcing that impact the mineral content.
- Complying with the quality requirements defined in CLAYENS contractual documents, particularly regarding traceability and regulatory compliance of raw materials and components.

In the event of non-compliance or lack of concrete and reasonable measures from a supplier to meet this policy, CLAYENS reserves the right to take appropriate actions, which may include suspension or termination of the business relationship.

Continuous Improvement

CLAYENS aims to ensure that all its products are made from responsible raw materials and components. This involves continuous monitoring of its supply chain, promoting transparency, traceability, and the constant improvement of practices, in line with its ethical, regulatory, and societal commitments.

The Procurement Department and the Health, Safety, and Environment (HSE) Department are responsible for defining the policy, evaluating the overall effectiveness of its implementation, and updating it annually. The operational implementation of this policy is the responsibility of the Procurement and HSE Departments. Senior Management is committed to providing the necessary human and material resources to achieve the set objectives.

EVP Procurement
Alexandra TELEKI



EVP Industry, Quality, ESR
Eric MANNESSIER

