

Directive to Duty of care at Conflict minerals

V01 / July 20, 2025

Very Dear business partner,

SCHREMPP electronic GmbH is committed to a transparent supply chain in which human rights and environmental standards are adhered to (hereinafter referred to as the "conflict-free supply chain"). SCHREMPP electronic GmbH fully supports the objectives of the US Dodd-Frank Act and the EU Regulation (EU) 2017/821 on conflict minerals ¹.

Included is it okay about the due diligence for the responsible sourcing of 3TG minerals as well as the raw materials cobalt, mica, copper, natural graphite, lithium and nickel.

Objective

SCHREMPP electronic GmbH condemns any kind of activity that promotes violence and human rights violations as well as negative Environmental impacts cause. Through the Creation and Implementation a directive to Duty of care at Conflict minerals, want SCHREMPP electronic GmbH a Contribution contribute to identifying, making transparent, and managing the actual and potential risks. impede, to reduce or to fix. It acts itself included to a continuous and reactive process that can be improved over time.

Please Please note :

- SCHREMPP electronic GmbH buys no Conflict minerals direct out of any Conflict region and also strives not to buy products that contain raw materials through whose sale armed Groups in Conflict- and High-risk areas are directly or indirectly financed or supported.
- SCHREMPP electronic GmbH expected from his Suppliers, that she Minerals only from conflict-free sources and relies on information from suppliers.
- The Conflict Minerals Due Diligence Policy can be found at

<https://led-industrial-illumination.com/service/downloads/>

¹ legislation to Conflict minerals:

US: Dodd-Frank Wall Street reform and Customer Protection Act, Section 1502

EU: Regulation (EU) 2017/821 of the European Parliament and of the Council, 17. May 2017

definition Conflict Minerals ²

Conflict minerals (more generally: “conflict minerals” or “conflict resources”) are goods such as raw materials or natural resources that are often mined or extracted illegally and without government control in conflict regions and high-risk areas. Systematic violations of human rights and international law are associated with this. Therefore, it is an issue for Corporate Social Responsibility. Responsibility (CSR) and corporate due diligence.

In the Special are with Conflict minerals (English) " conflict minerals ") Tin, Tungsten, Tantal and gold meant – in their Entirety 3TG called, because of the English Designations Tin , tungsten , tantalum . The ores of these raw materials include cassiterite (tin ore), wolframite (tungsten ore), and coltan (tantalum ore). These ores are used particularly in electronic devices such as computers and mobile phones.

system to fulfillment the Duty of care

Based on Guide ³ the OECD (Organization for Economic Cooperation and Development), SCHREMP electronic GmbH has established a process to contribute to transparency in the supply chain.

This contains following Steps:

- annual examination the supply chain (relevant, immediate Suppliers) regarding the procurement of raw materials by smelters and metallurgical plants from conflict-affected and high-risk areas
- Result evaluation and Processing the own Reporting documents for downstream companies
- Communication of expectations regarding the elimination of non-compliant or high-risk smelters and smelters from the supply chain
- Reporting to the RMI (Responsible Minerals Initiative) about incorrect information in the returned “ Smelter List”
- continuous Monitoring the Supplier feedback;
particularly at Deviations (Raw material procurement from not compliant Sources)
or poor/lack of communication
- update the Reporting documents in the case from vacant Changes

² <https://www.imds-professional.com/konfliktmineralien-fachinformationen/>

³ https://www.oecd-ilibrary.org/governance/oecd-due-care-guidance-to-encourage-responsible-supply-chains-for-minerals-from-conflict-and-high-risk-areas_3d21faa0-de

Reporting documents

The both official Reporting documents become How follows defined:

“The Conflict Minerals Reporting Template (**CMRT**) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information on the country of origin of minerals and the smelters and refineries used throughout the supply chain.” ⁴

“The Extended Minerals Reporting Template (**EMRT**) is one free, standardized Reporting template developed by the Responsible Minerals Initiative (RMI) to identify bottlenecks and provide due diligence information in cobalt and mica supply chains to collect.” ⁵ The Template became in the April 2025 to the Raw materials Copper, Natural graphite , lithium and nickel added.

SCHREMPP electronic GmbH expected from his business partners one honest and transparent Disclosure of information; especially with regard to information on raw material sources. As long as the data has been compiled to the best of our knowledge and belief, SCHREMPP electronic GmbH has no reason to doubt the results obtained.

Melt and - Smelting plants

In dem process the annual Supply chain query demands SCHREMPP electronic GmbH his suppliers to remove non-compliant or high-risk resources from the supply chain. The majority of suppliers refer included on her Directive to responsible procurement of raw materials and confirm her Readiness and Support to Implementation one conflict-free supply chain. Because of the complexity and complexity from supply chains, requirement There is still a large human and time resource required to implement this process and achieve the set goals.

- **Not compliant Melt**

Some smelters and metallurgical plants are not yet compliant with RMAP ⁶ (Responsible Minerals Assurance Process), SCHREMPP electronic GmbH does not necessarily consider these to be “high-risk” just because they have not yet been audited.

As downstream Pursue has SCHREMPP electronic GmbH neither Influence still control about these melts and their use.

- **Inactive Melt**

Because closure dates vary considerably and inventories can remain in the supply chain for extended periods, inactive smelters and refineries often continue to be reported via reporting documents. SCHREMPP electronic GmbH expects that many of these smelters will be removed from the RMI templates in the short term.

⁴ <https://www.responsiblemineralsinitiative.org/reporting-templates/cmrt/>

⁵ <https://www.responsiblemineralsinitiative.org/reporting-templates/emrt/>

⁶ <https://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/>
<https://www.responsiblemineralsinitiative.org/minerals-due-diligence/standards/>

Many Thanks to for Her cooperation and Partnership,

SCHREMPP electronic GmbH

July 20, 2025

Reference documents

OECD Guide for the fulfillment the Duty of care to Promoting responsible supply chains for minerals from conflict-affected and high-risk areas

https://www.oecd-ilibrary.org/governance/oecd-guidance-for-the-fulfillment-of-due-care-duty-to-promote-responsible-supply-chains-for-minerals-from-conflict-and-high-sikogebieten_3d21faa0-de

OECD Handbook for environmental Due diligence obligations in mineral raw material supply chains

https://www.oecd-ilibrary.org/finance-and-investment/oecd-handbook-for-environmental-due-diligence-obligations-in-mineral-raw-material-supply-chains_5dc13640-de

Regulation (EU) 2017/821 of the European Parliament and of the Rates from the 17. May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores and gold from conflict-affected and high-risk areas

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017R0821>

Indicative list the from conflicts affected Areas and Areas with high Risk according to Regulation (EU) 2017/821

<https://www.cahraslist.net/cahras>

Lists the active and compliant facilities acc. RMI Assessment program

<https://www.responsiblemineralsinitiative.org/facilities-lists/indicators/>