

# Policy statement Conflict minerals

Siltronic position paper on conflict  
minerals in the supply chain

## Our position on conflict minerals

Siltronic AG and its subsidiaries have committed themselves to the principles of responsible and sustainable corporate business conduct. This includes the establishment of fair trading practices – also with regard to conflict minerals.

### What are conflict minerals?

Conflict minerals are the minerals tantalum, tin, tungsten, gold, including in their mineral form, as well as cobalt and mica ("3TG+CM" substances), provided they are mined in the Democratic Republic of the Congo or in neighboring countries and are also a source of financing for armed groups that commit human rights violations in these regions.

### Relevance for Siltronic

Even if Siltronic does not source these minerals directly, the company is aware that conflict minerals can occur in the supply chain. Siltronic therefore also requires its suppliers to comply with all applicable laws worldwide and the principles set out in its Code of Conduct. We expect our suppliers not to source conflict minerals.

### Our commitment

Within our sphere of influence, we are committed to

- comply with our due diligence obligations to identify risks associated with conflict minerals
- to exclude conflict minerals from our products and our supply chain as far as possible
- not to source any potential conflict minerals from the Democratic Republic of the Congo and neighboring countries.

The legal requirements on conflict minerals of the EU and the U.S. Securities and Exchange Commission<sup>2</sup> are decisive here. In addition, the OECD Conflict Minerals Guidelines<sup>3</sup> and the Responsible Business Alliance (RBA) Code<sup>4</sup> form the basis for our activities to exclude conflict minerals.

### Approach to exclude conflict minerals

Siltronic has established and documented a procedure for the procurement of conflict-free minerals, the so-called Conflict Minerals Procedure. This defines the requirements for a due diligence review of the supply chain in order to identify the origin of potential conflict minerals:

- Every supplier that we invite to register in our supplier system must provide mandatory information on the use or procurement of conflict minerals.
- Questions on conflict materials are included in our criteria catalog for supplier audits.
- Part of this review is also the confirmation or certification of suppliers that potential conflict minerals do not originate from the Democratic Republic of the Congo or neighboring countries. This due diligence goes back to the inspection of the smelters on an ad hoc basis.

Procurement decisions may only be made on the basis of this due diligence review of the supply chain. Compliance with the Conflict Minerals Procedure is mandatory for Siltronic and its suppliers.

## Detecting and dealing with violations

All employees must report violations or suspicious circumstances to the local Compliance Officer or the Legal Department that could indicate a possible violation of the law or the Conflict Minerals Procedure. Suppliers or third parties who have concerns in this regard are encouraged to contact the appropriate Siltronic Compliance Hotline:

[www.siltronic.integrityline.com](http://www.siltronic.integrityline.com)

If we identify a risk relating to conflict minerals in our supply chain, we will take appropriate measures immediately.

Munich, September 2024

The Executive Board

Siltronic AG

- (1) EU regulation on conflict minerals (2017/821)
- (2) Dodd Frank Act Section 1502 of the U.S. Securities and Exchange Commission on conflict minerals
- (3) OECD (2016), OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition, OECD Publishing, Paris
- (4) As a supplier to the electronics industry, Siltronic observes the principles of the Responsible Business Alliance (RBA) initiative, which the company has actively supported as a member since May 2019.