

Responsible Sourcing of Minerals

Conflict minerals are minerals that are mined in conditions of armed conflict and human rights abuse, especially in high risk countries. The mining and trade of these minerals, including tin, tungsten, tantalum and gold (3TG), have contributed significantly to conflict financing and human rights violations, such as child and forced labor.

Hence, it is critical to undertake due diligence measures to ensure that the sourcing and use of these minerals, even if they represent a very minimal part of allnex purchases, do not contribute to conflict and human rights violations. This report presents the due diligence framework for conflict minerals at allnex.

At allnex we buy raw materials responsibly and we require suppliers to engage in a sustainability strategy, outlined in purchasing terms, contract templates, and a Supplier Code of Conduct, to ensure compliance with laws, regulations, industry standards, and sustainability requirements. Implementing a risk mitigation program and responsible sourcing strategies ensures to be compliant with high social, environmental and governance standards.

We are committed to compliant, responsible and ethical sourcing. The following key components constitute our due diligence framework, within which we operate:

1. Policy & Management System:

Our Conflict Minerals Standard Operating Procedure (SOP) defines the process to ensure compliance with the existing conflict minerals regulations and also ethical and responsible sourcing of minerals globally. Through our Management of Change process, we thoroughly review the presence of conflict minerals in our raw materials (for new raw materials and new vendors) and act accordingly as described in Conflict Minerals SOP.

2. Risk Assessment:

Supplier Evaluation Procedure evaluates and monitors CSR risks associated with working with suppliers through various assessment criteria, including CSR Risks associated with the industry, country and individual engagement of our suppliers.

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3. Due Diligence:

We undertake due diligence measures to ensure that the minerals in our products and supply chain are free of conflict. Due diligence measures may include the following:

- Engaging with suppliers to identify mineral sources and assess their due diligence practices;
- Participating in industry initiatives such as EcoVadis and TfS. Via the EcoVadis platform, we access and analyze supplier CSR data. Through this platform, we also connect with our network of suppliers and have access to scores in the areas of Environment, Labour & Human Rights, Ethics & Sustainable Procurement. Our membership at TfS - an association dedicated to actively raising Corporate Social Responsibility Standards throughout the chemical industry, enables us to access audit reports that were completed by 3rd parties audit companies; and
- Implementing traceability schemes, such as the RMI's Conflict Minerals Reporting Template (CMERT), to track the flow of minerals in the supply chain.

4. Reporting and Transparency:

Our report is in compliance with the relevant regulations and standards, such as the US SEC's Dodd-Frank Act and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals