



## **Conflict Minerals and Materials of Concern Policy**

### 1. Purpose

The purpose of this policy is to ensure that Tilsatec Limited responsibly sources raw materials, avoids contributing to human rights violations, and complies with applicable laws and customer requirements related to conflict minerals and materials of concern. This policy reflects our commitment to ethical business practices, environmental stewardship, and transparency throughout our supply chain.

### 2. Scope

This policy applies to:

- All company operations worldwide and to every employee, regardless of role or location.
- All suppliers, contractors, and partners that provide products, components, or materials to Tilsatec.

### 3. Definitions

#### Conflict Minerals

Conflict minerals refer to tantalum [Ta], tin [Sn], tungsten [W], and gold [Au], collectively known as 3TG, originating from the Democratic Republic of the Congo (DRC) or adjoining countries, as defined by:

- Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act.
- Any additional global regulations implemented to address conflict-related sourcing risks.

“Adjoining countries” refers to nations that share a border with the Democratic Republic of the Congo, including Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, and Uganda.

#### Materials of Concern

Materials of Concern include substances that:

- Are restricted or banned under regulatory frameworks such as RoHS, REACH, or other applicable standards.
- Present environmental, health, safety, or compliance risks.
- Are identified by Tilsatec as requiring special handling or reporting.

### 4. Policy Statement

#### 4.1 Commitment to Ethical Sourcing

Tilsatec is committed to ensuring that conflict minerals and materials of concern used in our products are sourced responsibly and do not directly or indirectly finance armed groups, human rights abuses, or environmental harm.

#### 4.2 Compliance with Laws and Regulations

We comply with all applicable laws, including but not limited to:

- The U.S. Dodd-Frank Act Section 1502
- EU Conflict Minerals Regulation
- RoHS, REACH, and global substance-restriction regulations

#### 4.3 Supplier Requirements

We require all suppliers to:

1. Exercise due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.
2. Provide complete and accurate reporting, including:
  - Conflict Minerals Reporting Template (CMRT)
  - Material declarations
3. Source 3TG only from smelters and refiners validated as conflict-free, such as those accredited by the Responsible Minerals Assurance Process (RMAP).  
If a smelter is not RMAP-conformant, suppliers should work to bring it into conformance or stop sourcing from that smelter.
4. Notify Tilsatec promptly of any known or suspected use of conflict minerals or restricted materials.
5. Implement corrective actions if materials of concern or non-compliant sourcing practices are identified.

#### 4.4 Internal Responsibility

Tilsatec shall:

- Monitor supplier compliance through surveys, audits, and/or risk assessments.
- Maintain documentation supporting due diligence activities and regulatory reporting.

Tilsatec's due diligence activities are proportionate to its position in the supply chain.

#### 4.5 Continuous Improvement

We are committed to:

- Strengthening supply-chain transparency,
- Promoting responsible sourcing practices,
- Supporting supplier education on conflict mineral regulations and materials of concern.

### 5. Consequences of Non-Compliance

If a supplier fails to comply with this policy, Tilsatec may take actions that include:

- Requesting corrective action plans,
- Suspending business, and/or terminating the supplier relationship.

### 6. Policy Review

This policy will be reviewed annually and updated as necessary to reflect regulatory changes, industry standards, and company values.

Signed: Maria Kramer, Technical Manager, 05<sup>th</sup> January 2026