

## thyssenkrupp Conflict Minerals Statement

Steel  
Packaging Steel

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Human rights, fair working conditions, environmental protection and the fight against corruption – these are values that we hold high within our Group and throughout our supply chain. We at thyssenkrupp are committed to the United Nations Global Compact. Acting responsibly is firmly integrated in our procurement processes. When awarding contracts, our decisions are not only based on economic, technological and process criteria. Sustainability also plays a key role in supplier management at thyssenkrupp Rasselstein. Moreover, we continuously develop our processes. This also means, for example, that we want to further increase transparency regarding the origin of raw materials and so-called conflict minerals to detect risks early.

### **Compliance with due diligence obligations in the supply chain of tin according to EU Regulation 2017/821**

The mining of certain minerals in the Democratic Republic of Congo (DRC) and other parts of the world sometimes contributes to significant human rights violations and to the financing of violent conflicts.

Within the European Union, importers of so-called conflict minerals are now subject to extensive obligations regarding due diligence and inspections across the supply chain in order to curb the financing of violence and human rights violations in areas of conflict or high-risks. Adopted on 05/07/2020, the implementing law for EU Regulation 2017/821 has been in force in Germany since 01/01/2021.

This affects our company because we are Union importers of tin. Already years ago, we established procedures in our company to review supply chains and identify risks. Our supply chains are transparent and are subject to regular audits, so we fully comply with the legal requirements.

As thyssenkrupp Rasselstein GmbH we also undergo an annual audit by a third party to check regularly that the legal requirements are being implemented. The result of the audit is published transparently on our homepage at <https://www.thyssenkrupp-steel.com/en/company/operations-and-business-units/packaging-steel/procurement/procurement.html> alongside our annual report on the action we are taking to implement due diligence obligations when importing tin.

### **Dodd-Frank Act on Conflict Minerals**

Since 2010, thyssenkrupp Rasselstein has been complying with the regulations of the United States of America, typically referred to as the Dodd-Frank Act (full name: "Dodd-Frank Wall Street Reform and Consumer Protection Act"). Section 1502 of the Dodd-Frank Act adopted by the U.S. Securities and Exchange Commission (SEC) require companies who file reports with the SEC to disclose whether the products they manufacture or contract

to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products. "Conflict minerals" contain cobalt, mica, tantalum, tin, tungsten and gold, regardless of where they are sourced, processed or sold. thyssenkrupp AG (including all its subsidiary companies) does not file reports with the SEC and therefore has no legislative obligations to comply with the conflict minerals requirements covered in Section 1502 of the Dodd-Frank Act. At the same time we recognize that the SEC final rule for Section 1502 mandates our direct and indirect customers to undertake due diligence across their global supply chains.

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### **Statement and Strategy**

We at thyssenkrupp Rasselstein endeavor not to purchase any material that contains these "conflict minerals" which directly or indirectly finance or benefit armed groups. To this end, we have implemented appropriate processes to understand where "conflict minerals" are being used in our products and to determine the source and the origin within our supply chain. These actions are based on established frameworks of the Organization for Economic Cooperation and Development (OECD), in particular the regulations in Annex II, and from other private sector initiatives. We contact our direct suppliers to increase the transparency of the materials they provide to thyssenkrupp. We personally conduct inspections on site, or commission third parties to regularly check the situation at our suppliers. We will continue to work closely with customers, suppliers and other stakeholders to ensure good approaches and workable solutions.

Recognizing the potential negative consequences of mineral extraction, trade, transshipment and export from conflict and high-risk areas, and our own responsibility to respect human rights and prevent conflicts escalating, we commit to adopting, widely disseminating and incorporating into contracts and agreements with suppliers the following strategy for responsible sourcing of minerals from conflict and high-risk areas, which is intended to provide common guidance on sourcing where conflict is an issue and on supplier risk awareness from the point of extraction through delivery to the end consumer. We commit to avoiding any action that could contribute to the financing of conflict and also commit to complying with all relevant UN sanctions resolutions and, where applicable, all national legislation implementing such resolutions.

### **Regarding serious abuses associated with the extraction, transport or trade of minerals:**

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of:
  - i) any forms of torture, cruel, inhuman and degrading treatment;
  - ii) any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
  - iii) the worst forms of child labor;
  - iv) other gross human rights violations and abuses such as widespread sexual violence;

- v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

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**Regarding risk management of serious abuses:**

- 2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

**Regarding direct or indirect support to non-state armed groups:**

- 3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
  - i) illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
  - ii) illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
  - iii) illegally tax or extort intermediaries, export companies or international traders.
- 4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

**Regarding public and private security forces:**

- 5. We agree to eliminate, in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.
- 6. We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.
- 7. Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. In particular, we will support or take steps, to adopt screening policies to ensure that individuals or

units of security forces that are known to have been responsible for gross human rights abuses will not be hired.

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8. We will support efforts, or take steps, to engage with central or local authorities, international organizations and civil society organizations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.
9. We will support efforts, or take steps, to engage with local authorities, international organizations and civil society organizations to avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

**Regarding risk management of public or private security forces:**

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraphs 8 and 9, we will respond in the same vein.

**Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export.

**Regarding money laundering:**

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

**Regarding the payment of taxes, fees and royalties due to governments:**

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we commit to disclose such payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (EITI).

**Regarding risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:**

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14. In accordance with the specific position of the company in the supply chain, we commit to engage with suppliers, central or local governmental authorities, international organizations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation.

**Slavery and Human Trafficking Statement**

thyssenkrupp AG is a signatory to the United Nations Global Compact and supports the United Nations Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO). thyssenkrupp Group is committed to eradicating slavery and human trafficking in its supply chain and own operations. Our efforts in this regard are described in the "Slavery and Human Trafficking Statement for thyssenkrupp AG and its Subsidiaries", which was drawn up in accordance with Section 54 of the United Kingdom Modern Slavery Act 2015.