



# GUIDELINE CONFLICT MINERALS MARBACH GROUP



PERFORMANCE  
since 1923

# Policy on the Sourcing and Use of Conflict Minerals

## 1. PURPOSE AND GOAL

The purpose of this policy is to ensure that our company does not source conflict minerals from areas associated with armed conflict and human rights abuses. Our goal is to contribute to peace and stability in affected regions through responsible sourcing.

## 2. SCOPE

This policy applies to all business units and subsidiaries of our company, as well as to all suppliers, subcontractors and business partners who supply materials that may contain conflict minerals.

## 3. DEFINITIONS

- Conflict Minerals: Minerals that are mined and sold in certain conflict regions to fund armed groups. These include tin, tantalum, tungsten and gold (also known as “3TG”).

- Conflict regions: Areas characterized by armed conflict, human rights abuses and instability, in particular the Democratic Republic of Congo and its neighboring countries.

## 4. PRINCIPLES

### 4.1. Responsible sourcing:

We strive not to purchase minerals from sources that contribute to the financing of armed conflict or human rights abuses.

### 4.2. Transparency and traceability:

We will verify the origin of the minerals used in our products and ensure that our supply chain is transparent and traceable.

### 4.3. Supplier engagement:

We expect our suppliers and business partners to adhere to this policy and to review and document their own supply chains.

## 5. SUPPLY CHAIN REQUIREMENTS

### 5.1. Supplier Assessment:

All suppliers are required to provide us with information on the origin of the minerals they supply. In working with our suppliers, we ensure that they can demonstrate that their products are conflict free.

### 5.2. Due Diligence:

Suppliers must demonstrate that they exercise due diligence in sourcing minerals and conduct regular audits to ensure compliance with this policy.

### 5.3. Reporting:

Suppliers are required to submit regular reports on their due diligence and the results of their audits.

## 6. INTERNAL MANAGEMENT

### 6.1. Responsibility:

An interdisciplinary team consisting of representatives from Purchasing, Compliance and Sustainability is responsible for implementing and monitoring this policy.

### 6.2. Training:

We will conduct regular employee training to raise awareness of conflict minerals and the requirements of this policy.

### 6.3. Monitoring and Audits:

We will conduct regular internal and external audits to verify compliance with this Policy and to ensure that our sourcing practices meet the highest ethical standards.

## 7. CONSEQUENCES OF NON-COMPLIANCE

Suppliers who fail to comply with this policy will be required to take immediate corrective action. In the event of continued non-compliance, we reserve the right to terminate business relationships with such suppliers.

## 8. REVIEW AND UPDATE

This policy will be periodically reviewed and updated as necessary to ensure that it reflects current legal requirements and industry best practices.

## 9. PUBLICATION

This policy will be published on our corporate website and made available to all relevant stakeholders.



Peter Marbach

Owner & Managing Director

Marbach Group



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This guideline comes into force on 01.09.2024 and replaces all previous guidelines on this topic.

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Marbach Group

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