## **VusionGroup**



Date: July 2024

## **Conflict Minerals Policy**

Dear Customers and Partners.

The procurement of **3TG (tin, tungsten, tantalum, and gold)** carries the risk of funding organizations in high-risk regions such as the Democratic Republic of the Congo and neighboring countries, where child labor, harsh working conditions, and corruption are prevalent. The Group's purchasing policy mandates that suppliers and subcontractors comply with applicable laws and regulations regarding the sourcing of these minerals, including the **European regulation on conflict minerals (2021)**.

In accordance with this regulation, the Group ensures that the procurement of these minerals is not used to finance, directly or indirectly, armed groups whose activities contravene human rights. Suppliers must also, as may be required by law, exercise due diligence in the choice of the source and the traceability of the minerals and, consequently, require the same diligence from their suppliers.

To guarantee the compliance of our activities with this regulation, reports on conflict minerals are required from our suppliers and are an integral part of our audits and supplier self-assessment questionnaires. When no reporting on conflict minerals is available, corrective actions are defined and the supplier is required to implement them with a progressive approach. The implementation of these mutually agreed corrective actions is closely monitored by the Group.

In addition, VusionGroup has partnered with EcoVadis, the world's largest and most trusted provider of business sustainability ratings to require its suppliers to perform EcoVadis' assessment. EcoVadis uses a methodology on conflict minerals that is in line with the OECD's Due Diligence Guidance. This is designed to:

- Identify if rated companies use or sell 3TG in their supply chain based on their activities
- Examine if rated companies have a comprehensive management system for risk control of conflict minerals

VusionGroup leverages EcoVadis ratings to monitor suppliers, enhancing their sustainability performance. As part of this process, suppliers undergo regular appraisals using the EcoVadis assessment methodology, ensuring transparency throughout the Group's supply chain. Subsequently, VusionGroup can efficiently shortlist suitable business partners.

The quality team will continue to follow the OECD's Due Diligence Guidance and ensure that suppliers also comply with these guidelines. VusionGroup remains committed to participating in international efforts aimed at responsible procurement of 3TG minerals.

This policy is reviewed annually by the strategic sourcing team in collaboration with EcoVadis to ensure it is in line with current international standards.