

## Salcomp Conflict Minerals Report For the reporting period from January 1, 2025 through December 31, 2025

### Table of Contents

- 1.0 Definition
- 2.0 Reasonable Country of Origin Inquiry (RCOI)
- 3.0 Conflict-Free Determination
- 4.0 Conflict Minerals Due Diligence Design
- 5.0 Description of Due Diligence Measures Performed
- 6.0 Additional Measures to be Taken
- 7.0 Reporting Determination and Findings
- 8.0 Country of Origin and Smelters/Refiners Lists

### 1.0 Definition

Conflict minerals are defined as raw mineral sources of Tin, Tantalum, Tungsten and Gold that maybe financing conflict in the Democratic Republic of the Congo or an adjoining country. They are frequently referred to as 3TG.

- CMRT – Conflict Minerals Reporting Template
- CC – Covered Countries (also known as the adjoining countries of the DRC)
- DD – Due Diligence (Verify / Check)
- DRC – Democratic Republic of the Congo
- OECD – Organization for the Economic Cooperation and Development ([www.oecd.org](http://www.oecd.org))
- RBA – Responsible Business Alliance ([www.responsiblebusiness.org](http://www.responsiblebusiness.org))
- RCOI – Responsible Country of Origin Inquiry (Survey / Ask)
- RMAP – Responsible Minerals Assurance Process (RMAP)
- RMI – Responsible Minerals Initiative ([www.responsiblemineralsinitiative.org](http://www.responsiblemineralsinitiative.org))
- SET – Smelter Engagement Team
- SOR – Smelter or Refiner
- 3TG – Tin, Tantalum, Tungsten & Gold
- CRT – Cobalt Reporting Template

### 2.0 Reasonable Country of Origin Inquiry (RCOI)

Salcomp conducted a good faith reasonable country of origin inquiry regarding the Conflict Minerals. This Inquiry was designed to determine whether any of the Conflict Minerals originated in the Democratic Republic of the Congo, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia, or Angola (collectively, Covered Countries), and whether any of the Conflict Minerals may be from recycled or scrap sources.

### 3.0 Conflict-Free Disclosure

Based on the RCOI and good faith efforts, Salcomp did have reason to believe that the conflict minerals had originated in the DRC or the CC. Therefore, we conducted Due Diligence (DD) on the source and custody of conflict minerals in our products and created this Conflict Minerals Report (CMR) with the required elements. Furthermore, based on due diligence described further in this report, Salcomp has not yet fully determined that the conflict minerals have not financed or benefited armed groups in the region. Salcomp has achieved 100% conflict-free with the reported and verified smelters.

#### **4.0 Conflict Minerals Due Diligence Design**

Salcomp is not a direct purchaser of ore or unrefined minerals; it is several tiers “downstream” from the smelters or refiners (SORs) of such minerals. SORs are at the point in the supply chain where ore, concentrates and/or scrap material are converted to a metal. Salcomp, like many downstream companies, does not have direct business relationships with SORs or visibility to the extraction and movement of Conflict Minerals between SORs and upstream entities. This position increases the difficulty of determining the origin of the Conflict Minerals in Salcomp products and, as a result, Salcomp relies on established industry processes and information provided from its in-scope direct suppliers

#### **5.0 Description of Due Diligence Measures Performed**

Salcomp upholds a high standard of due diligence to meet legal requirements and internationally accepted standards, with the ultimate goal of establishing and maintaining a responsible supply chain for 3TG. Salcomp aligns its Responsible Minerals Policy with the Organisation for Economic Co-operation and Development (OECD) Guidance for Conflict-Affected and High-Risk Areas (CAHRAs). As a member of the Responsible Minerals Initiative (RMI) our due diligence process utilizes RMI resources including the Conflict Minerals Reporting Template (CMRT) and the Responsible Minerals Assurance Process (RMAP), augmented by the London Bullion Market Association (LBMA), the Responsible Jewellery Council Chain of Custody Standard (RJC CoC), and the Tungsten Industry – Conflict Minerals Council (TI-CMC). The RMAP, LBMA, RJC CoC, and TI-CMC use independent third-party audits to identify SORs that have systems in place to assure focus minerals are sourced responsibly. RMAP, LBMA, RJC CoC, and TI-CMC are recognized by industry as third-party validation schemes.

Below is a description of the due diligence measures performed by Salcomp for the Reporting Period

1. OECD Step 1: Establish strong company management systems.
  - The Salcomp Responsible Minerals team reports to Salcomp’s Quality director. During the year, we reported to Salcomp’s Procurement management on topics such as CMRT collection efforts, in-scope supplier conflict-free progress, SOR risk mitigation, and driving identified SORs toward RMAP, LBMA, RJC CoC, or TI-CMC engagement
  - Implemented Salcomp Responsible Minerals Policy to include 3TG from the Covered Countries and CAHRAs. This policy outlines Salcomp’s dedication to ethical and responsible minerals sourcing due diligence consistent with the OECD Guidance. This policy also emphasizes Salcomp’s expectations with its hardware suppliers for sourcing minerals responsibly. Our policy is publicly available and can be found at <https://salcomp.com/new/code-of-conduct/>.
  - Included Responsible Minerals requirements in standard contract templates: All Salcomp’s hardware suppliers are required to sign a contract agreement to only source minerals responsibly, in alignment with SALCOMP’s Responsible Minerals Policy.
2. OECD Step 2: Identify and assess risks in the supply chain
  - Requested Salcomp’s in-scope direct suppliers to survey their upstream suppliers once a year to identify SORs and related Conflict Minerals information through the RMI CMRT.
  - Managed collection of CMRTs and reviewed the information provided in the CMRTs against Salcomp’s validation criteria and OECD Guidance.
  - Used RMI Compliant Smelter Sourcing Information and other research to ascertain whether any Conflict Minerals in Salcomp products may have originated in the Covered Countries.

- Compared SORs identified by the in-scope direct suppliers against RMI information to determine valid SORs and their RMAP status; also checked the status of SORs against LBMA, RJC CoC, and TI-CMC information.
  - Collaborated and/or supported suppliers within multiple layers of the supply chain to trace the high-risk SORs
3. OECD Step 3: Design and implement strategies to respond to identified risks.
- Required our in-scope suppliers to use SORs either actively pursuing or assessed as conformant to the recognized third-party schemes of RMAP, LBMA, RJC CoC, or TI-CMC. Acceptance was given to SORs meeting SALCOMP's requirements of being a refiner of 100% recycled 3TG material.
  - Salcomp requested suppliers to promptly transition from SORs that had not been validated conformant by a recognized third-party assessment scheme.
  - Extended Responsible Minerals support beyond first tier suppliers. We continued one-on-one training and joint outreach for new suppliers or personnel.
  - Collaborated with companies across the supply chain and/or industry groups to establish an ethical and responsible minerals sourcing supply chain.
  - Stayed informed of macro–Conflict Minerals issues and developments through participation in the RMI.
  - Implemented Responsible Sourcing Blockchain Network (RSBN) to improve 3TG and other minerals' supply chain transparency, traceability, and accountability. Salcomp expects that RSBN will eventually contribute to the improvement of living conditions and economic diversity of mining communities.
4. OECD Step 4: Report on supply chain due diligence.
- Pursuant to the Rule, Submit file Form SD and Salcomp's Conflict Minerals Report.
  - Published the 2025 Conflict Minerals Report on Salcomp's Responsible Minerals website <https://salcomp.com/new/code-of-conduct/>.
  - Retained records related to Conflict Minerals in conformance with SALCOMP's records retention policy.

## 6.0 Additional Measures to be Taken

Salcomp will take further steps in calendar year 2026 to improve our efforts and to continue our results.

- Continue to work closely with suppliers to obtain the necessary information on the origin of 3TG contained in the materials or components used in the Covered Products.
- Continue to directly engage smelters and refiners to undergo RMAP audits through active participation in RMI workgroups. Contribute volunteer as SPOC (Single Point of Contact) for 3TG and cobalt refiner in Asia, which plays important roles in RMI, who builds relationship with eligible SORs (Smelters or Refiners) and liaise between the RMI program and SORs.
- Further automate our consolidation of supplier CMRT and CRT data.
- Further institutionalize Cobalt along with 3TG.

## 7.0 Reporting Determination and Findings

The following chart illustrates the composition of 113 SORs in SALCOMP's supply chain that (as of December 31) were conformant or actively participating in a third-party scheme.



**Salcomp Requirement for Suppliers to be Conflict Free**

During 2026, Salcomp continued its initiative to have all in-scope direct suppliers achieve a conformant supply chain as defined by its Responsible Minerals Policy. In-scope direct suppliers with CMRTs containing SORs that are not progressing toward, or have not already received conflict-free accreditation, are required to transition those SORs from products provided to SALCOMP. The SALCOMP Responsible Minerals team and the Global Procurement organization work with those suppliers to help them achieve this goal. Their progress is tracked and reported to SALCOMP Procurement executives monthly along with SALCOMP's progress toward attaining 100% conformant status.

**Salcomp's Next Steps to Mitigate Conflict Minerals Risk**

Salcomp expects to take the following steps to enhance its due diligence measures and to continue mitigating the risk that the Conflict Minerals contained in SALCOMP products finance or benefit armed groups in the Covered Countries:

- By participating in the RMI, contribute to the continued development of collaborative tools and resources for companies to assess their supply chains and avoid inclusion of non-validated Conflict Minerals in the extended supply chain
- Remain aware of developments in Conflict Minerals due diligence processes by participation in the RMI and apply that knowledge to SALCOMP's Conflict Minerals risk assessment and mitigation actions.
- Work with RMI members and SALCOMP in-scope suppliers to gain SOR's commitment for their continued engagement with an RMAP assessment or another recognized validation scheme.
- Pursue resolution for any future identified SORs in SALCOMP's supply chain that are not currently validated conformant to one of the recognized assessment schemes.

- Improve in-scope direct suppliers' CMRT upstream supplier completeness; provide collaboration from SALCOMP and other upstream suppliers to attain 100% upstream coverage.
- Drive in-scope direct suppliers to provide product-specific CMRTs versus company-level CMRTs, as company-level CMRTs may include SORs not used in the supply chain for SALCOMP products; use of product-specific CMRTs by in-scope direct suppliers enables SALCOMP to have a more precise list of SORs used in SALCOMP products.
- Engage SALCOMP Systems Development and Procurement on future products to ascertain conformant status of SORs to be used by the proposed in-scope direct suppliers. Eliminate use of any nonconformant SORs prior to introduction of the product to the marketplace.
- Utilize RSBN to improve the end-to-end supply chain in support of SALCOMP's Responsible Minerals Policy.

## 8.0 Country of Origin and Smelters/Refiners Lists

### Salcomp 3TG Smelter List

#### Conformant Smelters

Tin	Aurubis Beerse	BELGIUM
Tin	Mineracao Taboca S.A.	BRAZIL
Tin	Minsur	PERU
Tin	Operaciones Metalurgicas S.A.	BOLIVIA (PLURINATIONAL STATE OF)
Tin	PT Timah Tbk Kundur	INDONESIA
Tin	PT Timah Tbk Mentok	INDONESIA
Tin	Fenix Metals	POLAND
Tin	Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	CHINA
Tin	China Tin Group Co., Ltd.	CHINA
Tin	Mitsubishi Materials Corporation	JAPAN
Tin	Alpha Assembly Solutions Inc	UNITED STATES OF AMERICA
Tin	Gejiu Non-Ferrous Metal Processing Co., Ltd.	CHINA
Tin	PT Mitra Stania Prima	INDONESIA
Tin	Rui Da Hung	TAIWAN, PROVINCE OF CHINA
Tin	Metallic Resources, Inc.	UNITED STATES OF AMERICA
Tin	O.M. Manufacturing Philippines, Inc.	PHILIPPINES
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	CHINA

Tin	Dowa	JAPAN
Tin	PT ATD Makmur Mandiri Jaya	INDONESIA
Tin	Tin Technology & Refining	UNITED STATES OF AMERICA
Tin	EM Vinto	BOLIVIA (PLURINATIONAL STATE OF)
Tin	O.M. Manufacturing (Thailand) Co., Ltd.	THAILAND
Tin	Magnu's Minerais Metais e Ligas Ltda.	BRAZIL
Tin	PT Cipta Persada Mulia	INDONESIA
Tin	Aurubis Berango	SPAIN
Tin	Chifeng Dajingzi Tin Industry Co., Ltd.	CHINA
Tin	PT Mitra Sukses Globalindo	INDONESIA
Tin	CRM Synergies	SPAIN
Tin	Tin Smelting Branch of Yunnan Tin Co., Ltd.	CHINA
Tin	Malaysia Smelting Corporation (MSC)	MALAYSIA
Tin	Thaisarco	THAILAND
Tin	White Solder Metalurgia e Mineracao Ltda.	BRAZIL
Gold	Western Australian Mint (T/a The Perth Mint)	AUSTRALIA
Gold	Metalor Technologies (Singapore) Pte., Ltd.	SINGAPORE
Gold	Metalor Technologies S.A.	SWITZERLAND
Gold	Aida Chemical Industries Co., Ltd.	JAPAN
Gold	Asahi Pretec Corp.	JAPAN
Gold	Dowa	JAPAN
Gold	Ishifuku Metal Industry Co., Ltd.	JAPAN
Gold	JX Nippon Mining & Metals Co., Ltd.	JAPAN
Gold	Kojima Chemicals Co., Ltd.	JAPAN
Gold	Matsuda Sangyo Co., Ltd.	JAPAN
Gold	Mitsubishi Materials Corporation	JAPAN
Gold	Mitsui Mining and Smelting Co., Ltd.	JAPAN
Gold	Nihon Material Co., Ltd.	JAPAN
Gold	Sumitomo Metal Mining Co., Ltd.	JAPAN
Gold	Tanaka Kikinzoku Kogyo K.K.	JAPAN
Gold	Tokuriki Honten Co., Ltd.	JAPAN

Gold	Asaka Riken Co., Ltd.	JAPAN
Gold	Argor-Heraeus S.A.	SWITZERLAND
Gold	Asahi Refining Canada Ltd.	CANADA
Gold	Asahi Refining USA Inc.	UNITED STATES OF AMERICA
Gold	Metalor Technologies (Hong Kong) Ltd.	CHINA
Gold	Metalor USA Refining Corporation	UNITED STATES OF AMERICA
Gold	Metalurgica Met-Mex Penoles S.A. De C.V.	MEXICO
Gold	Ohura Precious Metal Industry Co., Ltd.	JAPAN
Gold	Royal Canadian Mint	CANADA
Gold	Metalor Technologies (Suzhou) Ltd.	CHINA
Gold	CCR Refinery - Glencore Canada Corporation	CANADA
Gold	Solar Applied Materials Technology Corp.	TAIWAN, PROVINCE OF CHINA
Gold	LS MnM Inc.	KOREA, REPUBLIC OF
Gold	Heraeus Metals Hong Kong Ltd.	CHINA
Gold	Umicore S.A. Business Unit Precious Metals Refining	BELGIUM
Gold	United Precious Metal Refining, Inc.	UNITED STATES OF AMERICA
Gold	Valcambi S.A.	SWITZERLAND
Gold	Aurubis AG	GERMANY
Gold	C. Hafner GmbH + Co. KG	GERMANY
Gold	Chimet S.p.A.	ITALY
Gold	Heimerle + Meule GmbH	GERMANY
Gold	Materion	UNITED STATES OF AMERICA
Gold	SEMPSA Joyeria Plateria S.A.	SPAIN
Gold	AngloGold Ashanti Corrego do Sitio Mineracao	BRAZIL
Gold	Boliden Ronnskar	SWEDEN
Gold	Istanbul Gold Refinery	TURKEY
Gold	MKS PAMP SA	SWITZERLAND
Gold	Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	CHINA
Gold	Jiangxi Copper Co., Ltd.	CHINA
Gold	PX Precinox S.A.	SWITZERLAND

Gold	Rand Refinery (Pty) Ltd.	SOUTH AFRICA
Gold	Agosi AG	GERMANY
Tungsten	Global Tungsten & Powders LLC	UNITED STATES OF AMERICA
Tungsten	H.C. Starck Tungsten GmbH	GERMANY
Tungsten	A.L.M.T. Corp.	JAPAN
Tungsten	Kennametal Huntsville	UNITED STATES OF AMERICA
Tungsten	Chongyi Zhangyuan Tungsten Co., Ltd.	CHINA
Tungsten	Japan New Metals Co., Ltd.	JAPAN
Tungsten	Xiamen Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Jiangwu Ferrotungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Yaosheng Tungsten Co., Ltd.	CHINA
Tungsten	Ganzhou Seadragon W & Mo Co., Ltd.	CHINA
Tungsten	Jiangwu H.C. Starck Tungsten Products Co., Ltd.	CHINA
Tungsten	Niagara Refining LLC	UNITED STATES OF AMERICA
Tungsten	Malipo Haiyu Tungsten Co., Ltd.	CHINA
Tungsten	Jiangxi Tonggu Non-ferrous Metallurgical & Chemical Co., Ltd.	CHINA
Tungsten	Jiangxi Xinsheng Tungsten Industry Co., Ltd.	CHINA
Tungsten	Jiangxi Gan Bei Tungsten Co., Ltd.	CHINA
Tungsten	Guangdong Xianglu Tungsten Co., Ltd.	CHINA
Tungsten	Lianyou Metals Co., Ltd.	TAIWAN, PROVINCE OF CHINA
Tungsten	Kennametal Fallon	UNITED STATES OF AMERICA
Tantalum	Yanling Jincheng Tantalum & Niobium Co., Ltd.	CHINA
Tantalum	Global Advanced Metals Boyertown	UNITED STATES OF AMERICA
Tantalum	Global Advanced Metals Aizu	JAPAN
Tantalum	Jiangxi Tuohong New Raw Material	CHINA
Tantalum	NPM Silmet AS	ESTONIA
Tantalum	D Block Metals, LLC	UNITED STATES OF AMERICA
Tantalum	Materion Newton Inc.	UNITED STATES OF AMERICA
Tantalum	TANIOBIS Japan Co., Ltd.	JAPAN
Tantalum	Metallurgical Products India Pvt., Ltd.	INDIA
Tantalum	Telex Metals	UNITED STATES OF AMERICA
Tantalum	FIR Metals & Resource Ltd.	CHINA
Tantalum	KEMET de Mexico	MEXICO
Tantalum	TANIOBIS Smelting GmbH & Co. KG	GERMANY
Tantalum	Mineracao Taboca S.A.	BRAZIL

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