

CONFLICT MINERALS POLICY

The SFA Group is committed to ethical and sustainable procurement that respects human rights. This applies to our own operations and to our entire global supply chain.

As a responsible company, the SFA Group is aware that minerals mined in high-risk and conflict-affected areas, such as the Democratic Republic of Congo (DRC) and neighbouring countries, can find their way into the supply chain of our products and fuel human rights abuses, conflict and environmental degradation.

Although the SFA Group does not purchase these minerals directly, it is aware of the possibility of conflict minerals being part of the supply chain. Therefore, the SFA Group is committed to:

- Avoid that our products contain minerals from conflict zones.
- Implement as soon as possible the necessary actions to remedy any identification of a supplier supplying products containing conflict minerals.

The SFA Group does not prohibit the sourcing of conflict minerals, as such a policy could be detrimental to mine operators who are working legally. However, we do ensure that the minerals concerned are sourced in accordance with current international standards, as specified in the Organization for Economic Cooperation and Development (OECD) guidelines.

Expectations of suppliers

It is essential that our suppliers cooperate to support our commitment to responsible and ethical sourcing. Relevant SFA Group suppliers must:

- Comply with EU Regulation 2017/821 (or applicable laws) which sets out supply chain due diligence obligations for importers of minerals from conflict or high-risk areas into the European Union.
- Identify the source of the minerals in question and inform in a transparent manner when they come from conflict or high-risk areas and are incorporated into products
- To procure these minerals in a responsible and legal manner.
- Respect the SFA Group Supplier Code of Conduct.
- Provide us with the information we deem necessary to ensure control, including completing the Conflict Minerals Reporting Template (CMRT).
- Extend the above expectations to their own suppliers.

The SFA Group believes in establishing and maintaining long-term relationships with suppliers. However, if a supplier is unable or unwilling to comply with this policy, the SFA Group may take action, up to and including termination of the partnership.

Paris, 14th November 2022



KE Hui
SFA Group Procurement Manager