# Policy on Conflict Minerals & Cobalt
## of the VDM Metals Group

Section 1502 of the US Dodd-Frank Wall Street Reform and Consumer Protection Act and the EU Conflict Minerals Regulation (EU) 2017/821 created a statutory framework for dealing with and importing “conflict commodities.”

These currently include tantalum, tin, tungsten, their ores (cassiterite, columbite-tantalite, and wolframite), and gold. Whenever the list of “conflict commodities” is supplemented by additional raw materials, those raw materials will automatically fall within the scope of this policy. In view of the risks for human rights violations in the context of cobalt mining, VDM Metals has decided to consider cobalt as a conflict commodity as well and to extend its policy to cobalt.

Deficient working conditions and social and environmental standards in the regions where conflict commodities are cut and processed constitute human rights risks in addition to grave political risks. VDM Metals meets its due diligence obligations along the supply chain and complies with applicable statutory regulations. VDM Metals expects the same of all its direct and indirect suppliers.

VDM Metals minimizes risks in the raw materials supply chain, and in so doing is guided by the principles of the OECD directive on meeting the diligence. In this regard, VDM Metals has recognized and applies the industry standard of the Responsible Minerals Initiative (RMI).

Any sourcing of conflict minerals – including cobalt – will only be pursued, if the direct and indirect suppliers (such as a smelter or a refinery) are listed on one of the active or conformant lists kept by RMI or if freedom from conflict is demonstrated by other means agreeable to VDM Metals.

All direct and indirect suppliers of VDM Metals are strongly encouraged not to deliver or use for VDM Metals any goods or products that originate in conflict or high-risk areas and therefore might have caused or fostered infringements of human rights.

Therefore, VDM Metals urges all suppliers that are connected with conflict commodities to produce appropriate proof of freedom from conflict in the form of RMI’s Conflict Minerals Reporting Template (CMRT) or RMI’s Extended Minerals Reporting Template (EMRT).

VDM Metals currently does not fall within the scope of regulation (EU) 2017/821. It is not a union importer of conflict minerals and does not source virgin material in the sense of the regulation. Where VDM Metals imports cobalt, this is pursued according to the standards laid out in this policy.

Werdohl, 01. August 2026
VDM Metals Group

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