

BASLER CONFLICT MINERALS POLICY

The following Declaration of the Basler Group is an integral part of the Basler **Code of Conduct** (CoC) and defines the requirements that Basler companies give themselves and their suppliers with regard to conflict minerals. Even though the Basler Group, as a downstream company, is not itself involved in the production or import of minerals and metals, we are nevertheless committed to the goal of EU Regulation 2017/821 as well as the Dodd-Frank Act (Section 1502) to curb trade in conflict minerals so as not to indirectly contribute to human rights abuses, exploitation and mistreatment of local communities, environmental pollution, corruption, and similar abuses in conflict areas.

We are committed to tracing the origin of **tin, tantalum, tungsten, gold** and **cobalt** in the components and products we purchase to the best of our ability, and to avoid being involved in their trade if they originate from conflict areas identified in Dodd-Frank Act Section 1502 or EU Regulation 2017/821.

To this goal we have established the following **risk management guidelines**:



■ **Implementation of the Conflict Minerals Policy in the Company**

The Basler Group makes every effort to communicate not only internally but also publicly that it is committed to the CoC and this Conflict Minerals Policy and expects the same from its suppliers.



■ **Use of alternative raw materials in product development**

As far as possible, the use of these minerals should already be avoided in product development and the use of alternative raw materials should be expanded.



■ **Supply chain management in the acquisition of raw materials**

We call on our suppliers to comply with due diligence obligations and to actively ensure compliance with human rights and guidelines. Our supplier qualification management regularly reviews new as well as existing suppliers with regard to their compliance with regulations. In addition, we require our suppliers who use the above-mentioned minerals to ensure that their own suppliers comply with these guidelines. To this end, we demand corresponding evidence throughout the supply chain up to the smelter or refiner level in accordance with the RMI (Responsible Minerals Initiative).



■ **Transparency**

Relevant actions (from monitoring to decision making) are documented for transparency. Insofar as we can verify that conflict minerals originating from the conflict and risk areas mentioned above occur in our products, this is communicated. Customers and contract partners are provided with respective information upon request or under obligations to do so.



■ **Identification and assessment of risks**

Potential risks in the supply chain are continuously identified and evaluated in cooperation with our suppliers.



■ **Demanding corrective actions**

If risks are identified, a more in-depth review is started. If violations are found to be highly likely, we demand corrective actions from our contractual partner, setting a deadline and threatening consequences.

■ **Violations and reporting obligations**

In the event of persistent violations, we will take contractual action; the business relationship will then be terminated temporarily or permanently. We will provide a report on violations and measures taken within the non-financial statement of the annual Group report.



Ahrensburg, 16.01.2024, Management Board

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