

Responsible sourcing of conflict minerals policy

Elkem supports and respects the protection of internationally proclaimed human rights for all, including the labour rights of our employees and workers in our supply chain. Elkem does not tolerate any activity that fuels conflict or violates human rights. For more information, please see the <u>Elkem Human Rights policy</u>.

Elkem is a signatory to the UN Global Compact and applies the corporate responsibility in accordance with the ten principles of human rights, labour rights, environmental precautionary approach and anti-corruption compliance.

Target group

This policy applies to the selection and retention of all suppliers to Elkem that provide materials that contain tin, tantalum, tungsten, gold and/or cobalt.

Supply chain commitment

As part of the global approach to respect human rights, Elkem is committed to responsible sourcing of raw materials. Through our <u>Code of conduct for business partners</u>, we expect our suppliers to adhere to the same high standard.

Elkem takes reasonable steps and efforts to conduct due diligence within our standardised audit systems to identify and prevent risk of adverse impact associated with the conditions of mineral extraction, especially considering operations in conflict-affected or high-risk areas. Elkem's policy on responsible sourcing of conflict minerals is in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the OECD Guidance).

Elkem is committed to responsible sourcing of minerals, including 3T, cobalt and gold, using the OECD Guidance, so as not to support any possible conflict with human rights abuses or environmental degradation.

Conflict minerals

Conflict minerals refers to raw materials or minerals that come from a particular part of the world where conflict is occurring and affects the mining and trading of those materials. Some mining operations in conflict-affected and high-risk areas have been linked to human rights violations including child labour, forced labour, and environmental degradation. These conflict minerals are tin, tantalum, tungsten (the "3T's"), cobalt and gold.

Elkem uses chemical compounds made from some of these minerals in small quantities in the silicones production process and has strict sourcing controls to ensure that procurement of these are done in full compliance with Elkem's global policies, and relevant EU and US regulations. This implies that we do not accept procurement of minerals from conflict-affected areas.

Elkem aims to be transparent in the traceability of all raw materials. Elkem is committed to responsible sourcing of minerals, including 3T, cobalt and gold, so as not to support any possible conflict with human rights abuses or environmental degradation. Elkem expect that our suppliers and business partners commit to the same high standards and do not source minerals form conflict-affected areas.

Revision history

R00	16.04.2021	First issue
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