

# RESPONSIBLE MINERAL SOURCING POLICY

## Eberspächer Group Policy on the Responsible Sourcing of Minerals

Eberspächer takes its corporate responsibility to respect human rights seriously. We are committed to this in our Eberspächer Code of Conduct and in our Eberspächer Declaration of Principles to respect human rights and avoid certain environmental violations.

We are aware of the risk of negative impacts on human rights associated with the extraction, trade and export of minerals, particularly from conflict and high-risk countries. These include **tin, tantalum, tungsten and gold** (so-called **conflict minerals**) as well as **cobalt** and **mica**.

The extraction of such minerals can contribute directly or indirectly to the financing of armed conflicts, forced and child labour or environmental destruction, for example in the DR Congo and neighbouring countries.

As early as 2012, the US Securities and Exchange Commission ("SEC") adopted disclosure and reporting obligations for US-listed companies regarding the origin of such conflict minerals on the basis of the US Dodd-Frank Wall Street Reform and Consumer Protection Act, Sec. 1502. The EU Conflict Minerals Regulation 2017/821 to curb trade in conflict minerals and the German MinRohSorgG from 2020 standardise further due diligence obligations for Union importers when dealing with such raw materials.

Eberspächer does not directly source minerals from conflict and high-risk areas and therefore does not fall directly within the scope of the above-mentioned legislation.

Nevertheless, we are aware that such raw materials can find their way into our products via components and parts that we purchase from our suppliers and that we are obliged to report on this. To identify and minimise such risks, we are guided by the principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas. We work closely with our suppliers to identify and, where possible, completely eliminate the introduction of conflict minerals into our products.

In this respect, we expect the same from our suppliers:

- cooperation in the fulfilment of due diligence obligations in the procurement of minerals,
- transparency with regard to the origin of the above-mentioned minerals contained in the products supplied, including upstream suppliers,
- ensuring that the above-mentioned minerals contained in supplied products originate from smelters and refiners that are registered on the RMI list as "active" or "conformant" smelters/refiners and have therefore not contributed to the financing of armed conflicts and human rights violations,
- reporting on request, but at least annually by using the Conflict Minerals Report Template (CMRT) for tantalum, tin, tungsten and gold and extended reporting by using the Extended Minerals Report Template (EMRT) for cobalt and mica and submitting it to Eberspächer.

Eberspächer reserves the right to terminate the cooperation with suppliers who do not make any efforts to deal with conflict minerals and disregard the above-mentioned requirements.