

# CONFLICT MINERALS POLICY

## 1. PARTICULARS

<b>Risk category</b>	Compliance
<b>Risk assessment</b>	Not complying with this policy may cause reputational damage.
<b>External reference</b>	ISO 9001, EU/local directives, regulations and standards, The regulation explained, Regulation (EU) 2017/821.
<b>Internal reference</b>	Solar Sustainability Policy
<b>Target group</b>	This conflict minerals policy applies to Solar Group's Code of Conduct framework and what this means for Solar. It serves to inform both internal and external stakeholders.
<b>Classification</b>	Public document
<b>Latest update</b>	July 2022
<b>Approved by</b>	SVP Commercial Market & Sourcing
<b>Responsible</b>	Commercial Market & Sourcing
<b>Contact person</b>	Compliance / ISO representative

## 2. OBJECTIVE OF THE POLICY

The Solar Conflict Minerals Policy provides high-level guidance on how the business can inform and help customers in relation to request regarding due diligence and use of conflict minerals in products offered by Solar.

## 3. POLICY

It is Solar policy to comply with all applicable laws and regulations of the countries and regions in which Solar operates.

Conflict Minerals refer to raw materials or minerals that are mined, refined, transported and sold from a particular part of the world that is plagued by civil wars, other armed conflicts or violations on human rights. The minerals may pass through numerous locations in neighbouring countries as they are shipped to processing facilities around the world.

Solar runs a responsible business as distributor in the EU. According to EU Regulation 2017/821, Solar is to be considered as a downstream company operating beyond the metal stage. Solar is therefore not underlying any obligations under the Regulation 2017/821.

Solar expects trading partners to exercise due diligence on the source and chain of custody of conflict minerals and to be able to identify the source of the metals and minerals contained in products supplied to Solar. This expectation is communicated in Solar's Supplier Code of Conduct.

For commercial reasons Solar will assist customers requesting information regarding use of conflict minerals in products from our trading partners as far as possible.

The Information will solely be based on information from Solar's trading partners. Solar will only check that the Conflict Minerals Reporting Template (CMRT) version received is valid according to the recommendations of the RMI. Valid CMRT's will be forwarded as is. Solar will therefore disclaim all liability for the accuracy and completeness of the information.

Solar cannot sign general statements that all products in our assortment meet the rules about conflict minerals.

#### **4. DEVIATIONS TO THE POLICY**

No deviations to this policy are allowed.

#### **5. DIVISION OF RESPONSIBILITIES**

In Solar, the Conflict Minerals Policy is headed by the Commercial Market & Sourcing Management Team securing involvement and focus on customer satisfaction. Solar Group Management plays a vital role as an overall committee when it comes to strategic initiatives and overall priorities.