

SONION CONFLICT MINERALS POLICY

1 Scope and Background

Sonion is aware of risks associated with sourcing of the so-called 'conflict minerals' such as tin, tungsten, tantalum and gold, also referred to as 3TG. We recognize that the trade in these minerals may finance armed conflict or contribute to using forced labor. We are committed to ensuring we purchase these minerals from responsible and conflict-free sources only. This Policy is a supplement to the Sonion Code of Conduct, supporting our value of being responsible.

This Policy applies to all individuals associated with Sonion, including but not limited to employees, directors, officers, agents, contractors, consultants, suppliers, and business partners worldwide. It extends to all business activities, operations, and relationships within and outside our organization. In Sonion, we will use our relationships with suppliers and business partners to encourage and promote sourcing of conflict-free minerals.

This Policy applies to all Sonion locations.

2 Applicable regulations and resources

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- REGULATION (EU) 2017/821 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 17 May 2017, laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk area
- Public Law No. 111-203 (07/21/2010), DODD-FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT, Sec. 1502
- Responsible Minerals Initiative (RMI)

3 Our approach

In Sonion, we utilize the Conflict Minerals Reporting Template (CMRT). It is a standardized reporting template developed by the Responsible Minerals Initiative (RMI) that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. We follow the below rules with our implementation:

- We always use the latest available revision of the CMRT
- We address all suppliers in our supply chain who directly provide us with any of the 3TG minerals or articles containing any of the 3TG minerals

- We aim at having complete information available for 98% of all articles containing any of the 3TG minerals and accept minimum 80% response rate from our suppliers within a calendar year
- We review all responses for any inconsistencies and non-compliance with the OECD Guidance and require suppliers to take corrective actions, where applicable
- We include Conflict Minerals evaluation as part of our Supplier Release process
- Responsiveness to CMRT requests is part of the Vendor Rating process, with an effect on the scoring
- We report on the status of Conflict Minerals Policy implementation annually as part of the Sonion ESG Report

4 Responsibilities

Quality Assurance Department

- Send out requests once per year, using the latest CMRT
- Tracking progress and reporting responses
- Review responses and align with Supply chain on the corrective actions
- Follow up on corrective actions

Supply Chain

- Support on communication with suppliers
- Follow up and escalation on nonresponsive suppliers
- Incorporate responsiveness annually into the Vendor Rating process

Employees

Sonion employees must raise concerns and actively report any suspected or actual breaches of this Policy through the relevant channels.

5 Reporting of Concerns and Breaches

Any concerns or suspected or actual breaches of this Policy must be reported immediately through your local HR Manager, Local Managing Director, or the Head of Compliance/General Counsel.

If you are not comfortable with this, or in case you have already taken action as described above, and you believe that the issue has not been handled correctly, you may report the issue to the Sonion Whistleblower Line in accordance with the Sonion Whistleblower Policy. You can access the Sonion Whistleblower Line here: <https://report.whistleb.com/en/sonion>

Any reported incidents will be promptly investigated, and appropriate actions will be taken, including implementing corrective measures and disciplinary actions. In Sonion, we will not tolerate harassment, vengeful actions, or other types of sanctions against any person who, in good faith, files a report or who assists Sonion in connection with the processing and investigation of a case. There will be no acts of retaliation taken against any employee who reports, in good faith, a violation or who assists Sonion with the investigation of a case.

6 Information

If you have any questions with respect to this Policy, contact the Environmental Law and Regulations Coordinator or the Quality Assurance Director.

7 Policy Review

This Conflict Minerals Policy will undergo regular reviews to ensure it meets our commitments and aspirations in relation to conflict-free sourcing of 3TG minerals. Updates will be made as necessary to align with changes in laws, regulations, or industry best practices. The most recent version of this Policy will always apply.