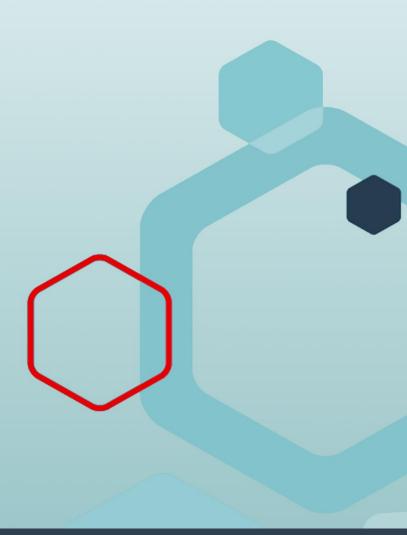


**Conflict Minerals Policy** 





## **Conflict Minerals Policy**

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## 1. Purpose Of The Policy

It is observed that some of the valuable natural resources such as tin, tungsten, tantalum, and gold (3TG) extracted from the Democratic Republic of Congo or its surrounding countries is affected by appalling activities like massacre and abduction of civilians by armed forces, looting and enrolling of child soldiers. Revenue generated from selling of these natural resources is used to perpetuate the fights. Procuring of such minerals from these distressed regions is equivalent to funding for these inhumane activities.

The term "Conflict Minerals" is defined as columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo (DRC) or an adjoining country.

At Voltaira GmbH, we are committed to upholding ethical standards in all aspects of our business operations. As part of this commitment, we recognize the importance of responsible sourcing and supply chain management, particularly concerning conflict minerals. Conflict minerals, including tin, tantalum, tungsten, and gold (3TG), sourced from conflict-affected and high-risk areas, can directly or indirectly finance armed conflict, human rights abuses, and environmental degradation. We understand the significant impact that these minerals can have on local communities and global stability.

Therefore, Voltaira GmbH hereby declares the following policy regarding conflict minerals:

- 1. Commitment to Responsible Sourcing: We are committed to sourcing conflict minerals from suppliers who share our values and adhere to responsible sourcing practices. We expect our suppliers to conduct due diligence on their supply chains to ensure that conflict minerals are not sourced from conflict-affected regions or mines associated with human rights abuses.
- 2. Traceability and Transparency: We will continue to work diligently to trace the origin of conflict minerals in our supply chain and promote transparency within our sourcing practices. This includes engaging with suppliers to obtain information about the smelters and refineries in their supply chains and encouraging the use of certified conflict-free sources.
- 3. Supplier Engagement and Collaboration: We will collaborate with our suppliers to raise awareness of the issue of conflict minerals and provide support and guidance on responsible sourcing practices. We will also encourage suppliers to adopt policies and procedures that align with our commitment to conflict-free sourcing.
- 4. Continuous Improvement: We are committed to continuously improving our conflict minerals management practices. This includes regularly reviewing and updating our policies and procedures to reflect evolving standards and best practices in responsible sourcing.
- 5. Compliance with Applicable Regulations: We will comply with all applicable laws and regulations concerning conflict minerals, including but not limited to the Dodd-Frank Wall Street Reform



- and Consumer Protection Act and regulations promulgated by the Securities and Exchange Commission (SEC).
- 6. Communication and Reporting: We will communicate our commitment to conflict-free sourcing to our stakeholders, including customers, investors, and the public. We will also provide regular updates on our progress towards achieving our conflict minerals goals.
- 7. Ethical and Legal Accountability: Voltaira GmbH holds itself accountable for upholding the principles outlined in this policy. Any violations of this policy will be taken seriously and addressed promptly and appropriately.

This Conflict Minerals Policy applies to all employees, contractors, and suppliers of Voltaira GmbH and it's all subsidiaries present in world and will be communicated to relevant stakeholders. We believe that by working together with our suppliers and stakeholders, we can make a positive impact and contribute to the responsible sourcing of minerals worldwide.

Date of Adoption: 01.01.2024 Raghuram B Devkar. Ast Manager Global Sourcing.

