

MOSCA GROUP CONFLICT MINERALS POLICY

A. INTRODUCTION

At **Mosca Group**, we are committed to:

- ✓ responsible sourcing of minerals and metals covered by both Section 1502 of the Dodd Frank Act ("Dodd Frank Act"), and Regulation (EU) 2017/821 of the European Parliament of 17 May 2017 ("EU Conflict Minerals Regulation");
- ✓ refraining from any action which will reasonably contribute to the financing of conflict; and
- ✓ taking reasonable measures to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions.

Our suppliers are expected to:

- ✓ Comply with the standards promulgated under Annex II of the OECD Due Diligence Guidance which the EU Conflict Minerals Regulation and the [SEC Final Rule](#) recognise as an international framework to perform due diligence for responsible sourcing;
- ✓ take steps by implementing due diligence measures and risk management strategies in cooperation with Mosca Group, if and where required; and
- ✓ make disclosures for Mosca Group to trace and show evidence that the minerals and metals contained in the goods that they supply to Mosca Group originate from conflict-free smelters and refiners.

B. APPLICATION

This policy, which is adapted from and consistent with Annex II of the OECD Due Diligence Guidance, applies to:

- the procurement of goods by **Mosca GmbH and its [affiliates](#)**, including but not limited to EAM Mosca Corp., (collectively, "Mosca Group"); and
- all suppliers of Mosca Group ("Mosca suppliers").

C. STANDARDS UNDER ANNEX II OF OECD DUE DILIGENCE GUIDANCE

Serious abuses associated with the extraction, transport or trade of minerals and metals:

1. While sourcing from, or operating in, conflict-affected and high-risk areas, we will not accept, by any means, the profiting from, contribution to, assistance with or the facilitation of the commission by any party of:

- i) any forms of torture, cruel, inhuman and degrading treatment;
- ii) any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- iii) the worst forms of child labour¹;

¹ See ILO Convention No. 182 on the Worst Forms of Child Labour (1999).

- iv) other gross human rights violations and abuses such as widespread sexual violence;
- v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

1A. Mosca Group suppliers are required to adhere to the above standard and impose no lesser standards on their own suppliers.

Risk management of serious abuses:

2. We may immediately suspend or discontinue engagement with our suppliers where we identify a reasonable risk that they are sourcing minerals and metals from, or linked to, any party committing serious abuses as defined in paragraph 1.

2A. We expect Mosca Group suppliers take a similar but no less conservative risk management approach regarding their own suppliers

Direct or indirect support to non-state armed groups²:

3. We do not wish to provide **direct or indirect support** to non-state armed groups through the extraction, transport, trade, handling or export of minerals and metals.

3A. Mosca Group suppliers are expected to not provide **direct or indirect support** to non-state armed groups through the extraction, transport, trade, handling or export of minerals and metals, and are required to impose no lesser requirements on their own suppliers.

Within the context of this policy, “**Direct or indirect support**” includes, but is not limited to, the procurement of minerals and metals from, making of payments to or otherwise provision of logistical assistance or equipment to, non-state armed groups or their affiliates who³:

- i) illegally control mine sites or otherwise control transportation routes, points where minerals and metals are traded and upstream actors in the supply chain⁴; and/or
- ii) illegally tax or extort⁵ money or minerals and metals at points of access to mine sites, along transportation routes or at points where minerals and metals are traded; and/or
- iii) illegally tax or extort intermediaries, export companies or international traders.

² To identify non-state armed groups, Mosca Group suppliers should refer to relevant UN Security Council resolutions.

³ “Affiliates” includes négociants, consolidators, intermediaries, and others in the supply chain that work directly with armed groups to facilitate the extraction, trade or handling of minerals and metals.

⁴ “Control” of mines, transportation routes, points where minerals and metals are traded and upstream actors in the supply chain means i) overseeing extraction, including by granting access to mine sites and/or coordinating downstream sales to intermediaries, export companies or international traders; ii) making recourse to any forms of forced or compulsory labour to mine, transport, trade or sell minerals and metals; or iii) acting as a director or officer of, or holding beneficial or other ownership interests in, upstream companies or mines.

⁵ “Extort” from mines, transportation routes, points where minerals and metals are traded or upstream companies means the demanding, under the threat of violence or any other penalty, and for which the person has not voluntarily offered, sums of money or minerals and metals, often in return for granting access to exploit the mine site, access transportation routes, or to transport, purchase, or sell minerals and metals.

Risk management of direct or indirect support to non-state armed groups:

4. We may immediately suspend or discontinue engagement with any suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3,

4A. Mosca Group suppliers are expected to take a similar but no less conservative risk management approach.

Public or private security forces:

5. We do not wish to provide, in accordance with paragraph 10, direct or indirect support public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals and metals at point of access to mine sites, along transportation routes or at points where minerals and metals are traded; or illegally tax or extort intermediaries, export companies or international traders⁶.

6. We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

7. We do not knowingly contract with public security forces directly but where private security companies are contracted by us or on our behalf in our supply chain, we require that such security companies comply with the [» Voluntary Principles on Security and Human Rights](#).

7A. Mosca Group suppliers are expected to impose the same requirement on public or private security forces that they engage with for and on our behalf.

8. Where we deem applicable or necessary, we may support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

8A. Mosca Group suppliers are expected to support or take steps to cooperate with us in this regard.

9. Where we deem applicable or necessary, we may support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise adverse impacts associated with the presence of security forces, public or private.

⁶ "Direct or indirect support" does not refer to legally required forms of support, including legal taxes, fees, and/or royalties that companies pay to the government of a country in which they operate (see paragraph 13 below on disclosure of such payments).

9A. Mosca Group suppliers are expected to support or take steps to cooperate with us in this regard.

Risk management of public or private security forces:

10. As a supplier of strapping machines, strapping material, conveying systems, and services, Mosca Group is not directly involved with upstream suppliers of minerals and metals but Mosca Group suppliers are expected to devise, adopt and implement risk management plans with upstream suppliers of minerals and metals as well as other stakeholders, if and where applicable, to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where a reasonable risk exists. Mosca Group suppliers are expected to suspend or discontinue engagement with non-compliant upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan⁷.

Bribery and fraudulent misrepresentation of the origin of minerals and metals:

11. We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals and metals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export⁸.

11A. Mosca Group suppliers are required to adhere to the above standard and impose no lesser standards on their own suppliers.

Money laundering:

12. Where we deem applicable or necessary, we may support efforts, or take steps, to contribute to the effective elimination of money laundering where a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals and metals derived from the illegal taxation or extortion of minerals and metals at points of access to mine sites, along transportation routes or at points where minerals and metals are traded by upstream suppliers has been identified.

12A. Mosca Group suppliers are expected to support or take steps to cooperate with us in this regard.

⁷ 8. As detailed in Step 3(D) of Annex I of the OECD Due Diligence Guidance, Mosca Group suppliers should conduct an additional risk assessment on those risks requiring mitigation after the adoption of the risk management plan. If within six months from the adoption of the risk management plan there is no significant measurable improvement to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, Mosca Group suppliers should suspend or discontinue engagement with their own supplier for a minimum of three months. Suspension may be accompanied by a revised risk management plan, stating the performance objectives for progressive improvement that should be met before resuming the trade relationship.

⁸ See OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997); and the United Nations Convention Against Corruption (2004).

Payment of taxes, fees and royalties due to governments:

13. Mosca Group suppliers who are liable to pay any taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are expected to pay to governments and commit to make disclosures of such payments in accordance with the principles set forth under the » [Extractive Industry Transparency Initiative \(EITI\)](#).

Risk management of bribery and fraudulent misrepresentation of the origin of minerals and metals, money-laundering and payment of taxes, fees and royalties to governments:

14. Mosca Group suppliers are expected to engage with their own suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measurable steps taken in reasonable timescales. Mosca Group suppliers are expected to suspend or discontinue engagement with upstream minerals and metals suppliers after failed attempts at mitigation⁹.

D. Disclosure Requirements

Mosca Group suppliers are required to provide Mosca Group with information and documentation (eg: certificate of origin) upon request, in the form and format and within the stipulated timeframe when such information is needed to be disclosed for compliance with the Dodd Frank Act and/or EU Conflict Minerals Regulation.

For avoidance of doubt, Mosca Group supplier's failure to adhere to the above disclosure requirements, refusal to cooperate with Mosca Group regarding the disclosure requirements above and/or intentional submission of falsified information to Mosca Group shall be deemed a material violation of this policy.

We may immediately suspend or discontinue engagement with our suppliers who are non-compliant with the disclosure requirements set forth above.

E. Complaint Management

Known or suspected violations by anyone or any entity who is or was working for Mosca GmbH and/or any of its affiliates can be reported to: compliance@mosca.com.

Alternatively, reports can be made anonymously using our » [Whistleblower Report Form](#).

⁹ As detailed in Step 3(D) of Annex I of the OECD Due Diligence Guidance, Mosca Group suppliers should conduct an additional risk assessment on those risks requiring mitigation after the adoption of the risk management plan. If within six months from the adoption of the risk management plan there is no significant measurable improvement to prevent or mitigate the risks of bribery and fraudulent misrepresentation of the origin of minerals and metals, money-laundering and payment of taxes, fees and royalties to governments, Mosca Group suppliers should suspend or discontinue engagement with the supplier for a minimum of three months. Suspension may be accompanied by a revised risk management plan, stating the performance objectives for progressive improvement that should be met before resuming the trade relationship

F. Revision of the policy

As a means of continuous improvement, it is necessary to review this policy at planned intervals and, if necessary, to adapt it to changing situations. Revisions, if any, will be carried out by the quality management team, who is also responsible for the publication and announcement of the updated version.

This policy dated 1 January 2023 has been approved by the Board of Directors of Mosca GmbH, the Management Holding Company for the globally operating Mosca Group

Waldbrunn, January 1, 2023

Mosca GmbH
Managing Board