

Behavioral Guidelines

Conflict Minerals

1 Introduction

Although OMICRON is not directly subject to specific conflict minerals legislation such as Section 1502 of the U.S. Dodd-Frank Act, OMICRON supports the broader objectives of responsible mineral sourcing and supply chain transparency. As part of this commitment, OMICRON aligns its due diligence efforts with internationally recognized industry initiatives, including the Responsible Minerals Initiative (RMI), and works with its suppliers to improve transparency and traceability regarding the origin of Conflict Minerals and Extended Minerals. Through these efforts, OMICRON aims to contribute to responsible sourcing practices and help prevent the direct or indirect financing of armed groups and other adverse impacts associated with mineral extraction and trade.

2 Scope

Conflict-Affected and High-Risk Areas (CAHRAs) are geographic areas identified as presenting a higher risk of conflict, human rights abuses, or other adverse impacts. Such areas may include, but are not limited to, the Democratic Republic of the Congo and adjoining countries as defined under Section 1502 of the U.S. Dodd-Frank Act.

Conflict Minerals currently include Tantalum, Tin, Tungsten, and Gold (commonly referred to as "3TG").

Extended Minerals currently include Cobalt, Copper, Graphite, Lithium, Mica, and Nickel.

The scope of minerals and geographic areas covered by responsible sourcing initiatives, customer requirements, or applicable regulations may evolve over time and may be updated accordingly.

3 OMICRON's Approach

OMICRON is committed to responsible sourcing practices and supports efforts to prevent Conflict Minerals and Extended Minerals from directly or indirectly financing or benefiting armed groups in Conflict-Affected and High-Risk Areas (CAHRAs).

OMICRON does not knowingly source Conflict Minerals or Extended Minerals that contribute to human rights abuses, armed conflict, or unlawful activities. As OMICRON does not purchase raw minerals directly, the company relies on its suppliers to provide information regarding the origin and processing of minerals contained in products and materials supplied to OMICRON.

To the extent that OMICRON products contain Conflict Minerals or Extended Minerals necessary to their functionality or production, OMICRON is committed to working with its supply chain to enhance transparency and traceability regarding the origin of these minerals.

OMICRON requires and encourages its suppliers to comply with applicable laws on conflict minerals and establish policies, due diligence processes, and management systems consistent with internationally recognized responsible sourcing standards. Suppliers are expected to support the identification and use of reputable smelters and refiners, including those that have successfully completed recognized independent third-party audit programs.

To support these efforts, OMICRON regularly requests suppliers to complete standardized industry surveys regarding the presence, origin, and sourcing of Conflict Minerals and Extended Minerals within the supply chain.

OMICRON strives to make relevant sourcing information available to its customers upon request, subject to data availability, supplier disclosures, and confidentiality requirements. Customers may use this information to support their own regulatory and responsible sourcing obligations. For conflict minerals and extended minerals reporting, OMICRON primarily relies on the Responsible Minerals Initiative (RMI) reporting templates, including the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT).

A handwritten signature in black ink, appearing to read 'J. Malin', is positioned above a blue horizontal line.

[Johannes Malin \(2026-09-21 15:16:50 GMT+2\)](#)