



STATEMENT ON CONFLICT MINERALS AND RESPONSIBLE RAW-MATERIAL SOURCING

DURUM VERSCHLEISS-SCHUTZ GMBH

14 September 2026

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Principles of Conduct of DURUM Verschleißschutz GmbH

DURUM Verschleißschutz GmbH, Carl-Friedrich-Benz-Str. 7, 47877 Willich, Germany

1. What this is about

The extraction of and trade in raw materials may, in conflict-affected and high-risk areas within the meaning of Article 2(f) of Regulation (EU) 2017/821, contribute to the financing of armed groups, to forced labor, and to serious human-rights violations. For tin, tantalum, tungsten, and gold, and their ores (conflict minerals, 3TG), that Regulation provides for specific due-diligence obligations. Comparable risks may exist for other raw materials, such as cobalt, nickel, and copper. We therefore apply the following principles to our raw-material sourcing as a whole.

2. Our position

To the extent that we are a Union importer within the meaning of Article 2(l) of Regulation (EU) 2017/821, we fulfill the due-diligence obligations of Articles 4 to 7 of that Regulation as well as the cooperation and information duties under the German implementing act (MinRohSorgG). Independently of this, we orient ourselves by the OECD Due Diligence Guidance for Responsible Mineral Supply Chains in our raw-material sourcing. We do not source raw materials that we know or ought to know contribute to the financing of armed groups or to serious human-rights violations.

3. Determination under Article 7(4) of Regulation (EU) 2017/821

We determine that the metals we import under commodity code CN 2849 90 30 ("tungsten carbides") from our recycling sources of supply originate only from recycling. They are recycled metals within the meaning of Article 2(s) of the Regulation, and not partially processed or unprocessed minerals or by-products of other ores. By far the greater part of our imports under this commodity code is recycled material.

We also source primary material to a limited extent. Those volumes fall below the thresholds of Annex I to the Regulation, in total per commodity code and calendar year. The foregoing information on volumes relates to the 2025 calendar year; we review and update it annually (section 6).

For recycled metals, the Regulation does not otherwise apply, in accordance with its Article 1(6). For recycled material, tracing back to the original origin is regularly not possible and is also not required under the Regulation. We document the recycled character in a comprehensible manner and do not misrepresent material as recycled material.

4. Our due-diligence measures

In the run-up to this determination we took the following due-diligence measures:

- a) sourcing the recycled materials exclusively from suppliers who confirm the recycled origin to us in writing,
- b) an annual plausibility check as part of our supplier dialogue,
- c) a daily sanctions-list screening through our ERP system,
- d) an annual comparison against the indicative list of conflict-affected and high-risk areas (CAHRA) provided by the European Commission,
- e) a complaints and whistleblowing mechanism through the whistleblower email address published on our website.

We expect our suppliers to give complete and truthful information. Where their information has been compiled to the best of their knowledge, we have no reason to doubt it, and we do not verify it beyond that plausibility check as long as there are no concrete indications. As a downstream company in the supply chain, we have neither influence over nor control of the selection and operation of the smelters and refiners.

Where a smelter or refiner is not yet validated, we do not regard it as risk-bearing for that reason alone; what matters are the concrete indications. Reporting formats also continue to list smelters that have ceased operations, because stocks remain in the supply chain over longer periods.

Where there are concrete indications that material contributes to the financing of armed groups or to serious human-rights violations, we suspend sourcing from the affected source until the indications have been dispelled. If a supplier permanently refuses to cooperate in the investigation, or if violations are not remedied, we may terminate the business relationship.

5. Information and contact

We answer customer inquiries about origin on the basis of the information available to us and, where possible, in a reporting format customary in the market, such as the Conflict Minerals Reporting Template (CMRT) or the Extended Minerals Reporting Template (EMRT) of the Responsible Minerals Initiative. We support customers who are subject to their own disclosure obligations with the information available to us.

We answer questions about this declaration and about our raw-material sourcing, in particular information requests from our customers and business partners, at compliance@durum.de.

Reports of risks in our raw-material supply chains may be submitted through our internal reporting office at hinweisgeber@durum.de. The reporting channel is also open to business partners and other third parties.

6. Status and updating

This statement supplements our Code of Conduct, which is published on our website. We review it at least once a year and on the occasion of material changes, and update it.

The German version of this Statement is authoritative. In the event of any discrepancy between the German and the English version, the German version prevails.

Willich, 14th September 2026

DURUM Verschleißschutz GmbH

A handwritten signature in blue ink, appearing to read 'P. Künig', is written over a horizontal line.

The Management