



## **Witt Policy for Conflict Raw Materials and Exclusion of Russian Steel & Wood**

By aligning with the United Nations Global Compact Initiative, Witt Invest and subsidiaries (hereinafter referred to as "Witt") underscore its commitment to Corporate Social Responsibility (CSR). At Witt, CSR encompasses the paramount safeguarding of human rights and environmental preservation, adherence to health and labor standards, and ethical business conduct. In this context, we champion responsible material procurement, considering their impact on both environmental and social aspects.

To effectively address prevailing social concerns within the supply chain, Witt recognizes the significance of industry collaboration in sourcing conflict minerals.

We require our suppliers to demonstrate respect for and compliance with extant legal mandates concerning the extraction of raw materials in regions marked as conflict and high-risk areas, often referred to as "conflict minerals" as defined, for instance, in the Dodd-Frank Act and corresponding EU regulations. The "conflict minerals" category encompasses minerals like cassiterite, coltan, wolframite, and their derivatives such as tin, tantalum, tungsten, and gold (collectively known as 3TG). These materials are frequently associated with human rights abuses and the potential financing of armed conflicts through their trade.

Witt does not source these minerals directly from mines in high-risk areas or elsewhere. The supply chain for these materials consists of numerous tiers, including mines, smelters, traders, exporters, refiners, alloy producers, and component manufacturers. Witt supports the validation of smelters and refiners for 3TG, recognizing their pivotal role in the supply chain from mining sites to the final product. Within this framework, Witt adheres to the OECD's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas."

In accordance with these OECD principles, we request our suppliers to disclose the origins and certification status of the smelters and refiners involved. We regularly report the results of our data collection and analysis of certification statuses. We encourage relevant suppliers and sub-suppliers to collaborate with smelters and refiners compliant with the Responsible Minerals Assurance Process (RMAP) by RMI, which identifies entities verifying that their raw materials do not originate from suppliers involved in conflicts in high-risk areas. We also strongly urge our suppliers to participate in the RMI or similar industry initiatives with the aim of enhancing conditions in the extractive sector.

Our suppliers are expected to confirm their adherence to the UN Global Compact Initiative and Witt's "Code of Conduct for Suppliers," which embodies our principles, along with extending these requirements to their own suppliers or Witt's sub-suppliers. If deemed necessary, Witt may request full transparency in critical supply chains and retain the right to conduct assessments or audits of suppliers facing potential risks. Regarding other raw materials that may carry the potential for adverse environmental and social consequences, we diligently monitor associated risks and take corrective actions, all while adhering to OECD guidelines and prevailing legal frameworks.



## THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

### Human Rights

- Businesses should support and respect the protection of internationally proclaimed human rights; and
- Make sure that they are not complicit in human rights abuses.

### Labour

- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- The elimination of all forms of forced and compulsory labor;
- The effective abolition of child labor; and
- The elimination of discrimination in respect of employment and occupation.

### Environment

- Businesses should support a precautionary approach to environmental challenges;
- Undertake initiatives to promote greater environmental responsibility; and
- Encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

- Businesses should work against corruption in all its forms, including extortion and bribery.

## Exclusion of Russian Steel & Wood

By aligning with the United Nations Global Compact Initiative, Witt underscores its commitment to Corporate Social Responsibility (CSR), encompassing the safeguarding of human rights, environmental preservation, and ethical business conduct. A key aspect of our CSR strategy is the responsible procurement of raw materials, addressing both environmental and social impacts.

In line with the European Union's sanctions against Russia following its invasion of Ukraine, Witt is committed to ensuring that no steel, wood, or other raw materials originating from Russia are used in our supply chains. The EU has imposed a series of restrictive measures, including bans on the import of steel and wood products from Russia, as these materials contribute to the Russian economy and potentially support conflict activities.

Witt requires all suppliers to comply with EU sanctions regulations, ensuring that neither Russian steel nor Russian wood is present in their supply chains. Suppliers must provide full traceability of the origins of raw materials used in their production processes, guaranteeing that none are sourced from Russia or other conflict-affected regions.

### Continuous Review

Witt is committed to continuously monitoring and improving our policies. We conduct review of our policies, procedures, and effectiveness in addressing these issues, with the aim of enhancing our practices and ensuring ongoing compliance.

All employees, partners and suppliers can report breaches of this Policy, which can be done in confidence, to our Whistleblower platform on <https://witt.indberet.nu/>.