

Conflict Minerals Policy

HAUBER-Elektronik GmbH is committed to maintaining a responsible and ethical supply chain. Human rights violations, forced labor, or the financing of armed conflicts associated with the extraction and trade of raw materials – particularly in so-called Conflict-Affected and High-Risk Areas (CAHRAs) – are incompatible with our business principles.

Regulatory Background

We observe the international regulatory requirements for transparency in the trade of conflict minerals. This is based on US legislation (Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502) and the EU Conflict Minerals Regulation (Regulation (EU) 2017/821). These require traceability in the procurement of the so-called "3TG" minerals:

- Tin
- Tantalum
- Tungsten
- Gold

Requirements for Our Suppliers

As a manufacturer of electronic products, we do not procure these minerals directly from smelters or mines, but rather process parts and components that contain these materials. We expect our direct suppliers to adhere to the following points to ensure transparency in the supply chain:

1. **Due Diligence:** The application of proprietary due diligence processes in accordance with the OECD Due Diligence Guidance.
2. **Data Transparency:** The regular provision of up-to-date information regarding the origin of the minerals, preferably using the standardized Conflict Minerals Reporting Template (CMRT) of the Responsible Minerals Initiative (RMI).
3. **Certified Sources:** The requirement to procure 3TG minerals primarily from smelters that have been verified as "conflict-free" (conformant) through independent audits (e.g., the RMI's RMAP program).

Measures in Case of Non-Compliance

If, as part of our supply chain due diligence, we determine that a supplier knowingly procures minerals from non-certified smelters that finance armed conflicts, we will request the supplier to transition to certified smelters. In the event of a persistent lack of cooperation, HAUBER-Elektronik GmbH reserves the right to draw appropriate business consequences from the business relationship.

Contact and Inquiries

Questions or information regarding this policy and our supply chain can be directed to us confidentially at any time. Our Material Compliance Management is gladly available for further information:

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Nürtingen, den 10.08.2026



Place and date

Tobias Bronkal, Managing Owner