

Purpose

This policy guides Alfen in addressing potential risks associated with conflict minerals and energy transition minerals that are present in our supply chain. Although Alfen does not source these minerals directly, we recognize that upstream mining and processing can involve significant social, human-rights, and environmental risks.

For the purposes of this policy, “high-risk minerals” refers to minerals extracted or processed in Conflict-Affected and High-Risk Areas (CAHRAs), or minerals whose supply chains present elevated risks of contributing to conflict, human-rights abuses, corruption, or severe environmental harm. This includes, but is not limited to, minerals covered by the OECD Due Diligence Guidance and those designated as critical or strategic under EU legislation.

Alfen aims to promote transparency and responsible sourcing across its value chain. This policy is informed by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs, the EU Conflict Minerals Regulation, and the Critical Raw Materials Act (CRMA). We intend to strengthen our due-diligence approach progressively, in line with our role, size, and position in the supply chain.

Scope

This Responsible Sourcing of Minerals Policy applies to all Alfen employees and to any entity that Alfen owns or controls. Employees are expected to follow this policy in all activities related to procurement and supply-chain decisions.

Direct suppliers, contractors, and business partners are expected to follow our responsible mineral sourcing standards when providing goods or services to Alfen. We also expect them to conduct due diligence within their supply chains.

When risks related to high-risk minerals arise, we engage collaboratively with our business partners to address them and support responsible sourcing practices throughout the value chain.

Our commitment

Alfen is committed to promoting responsible sourcing and supporting transparency related to high-risk minerals that may be present in the goods we purchase. We recognize that certain minerals, whether formally defined as conflict minerals or associated with broader social, environmental, and human-right risks, require heightened attention.

In line with Alfen role and position in the supply chain, our commitments include:

- Conflict minerals (tin, tantalum, tungsten, and gold): Alfen will begin developing clearer understanding of the potential presence of 3TG minerals in its supply chain. As a next step, this work will be supported by efforts to map the associated smelters and refiners and to prepare for a subsequent risk assessment.
- Energy-transition and other high-risk minerals: Alfen also seeks to build visibility over time regarding minerals essential for the energy transition, such as lithium, cobalt, graphite, and rare earth elements. Our intention is to progressively identify where these minerals may be present in our products and better understand associated risks.
- We aim to continuously explore opportunities to improve our responsible mineral sourcing practices where feasible and appropriate.

Consistent with OECD Guidance, Alfen does not support any form of human-rights abuses, the financing of armed groups, the unlawful or abusive conduct of both private and public security forces, bribery or fraudulent misrepresentation of mineral or material origin, money-laundering, or the non-payment of taxes, fees and royalties due to governments in Conflict-Affected and High-Risk Areas (CAHRAS). Where risks are identified, Alfen aims to work constructively with suppliers to assess them. If risks cannot be addressed, we will suspend or discontinue the business relationship.

Our expectations

Alfen expects all employees, suppliers, and business partners to support the responsible sourcing principles outlined in this policy by acting with integrity, respecting applicable standards, and cooperating with Alfen to enhance transparency. Suppliers are additionally expected to meet the requirements of our Supplier Code of Conduct and to cooperate with reasonable requests for available information that may support Alfen's responsible-sourcing efforts.

Our mechanisms

Alfen is developing a more structured approach to responsible mineral sourcing and is gradually putting supporting mechanisms in place. As our capabilities grow, we will build on the mechanisms already in place and gradually introduce additional measures, including the following:

- Integrating this policy into our supplier expectations by referencing it in our Supplier Code of Conduct.
- Engaging with relevant multi-stakeholder initiatives to build internal knowledge, benefit from shared industry practices and access tools, supporting the gradual development of our due-diligence capabilities that can improve visibility into upstream mineral supply chains.
- Introducing initial supplier-assessment activities with key strategic suppliers, such as concise questionnaires or screening tools, to obtain initial information relevant to our responsible sourcing efforts. These assessments help us identify potential mineral-related risks, score suppliers on key responsible-sourcing criteria, and engage with them to drive continuous improvement where needed.
- Continuously aligning our internal processes with recognized international frameworks and evolving good practices as our tools.
- Periodically reviewing this policy to reflect the development of our due-diligence practices and any new guidance or good practices.

M. Colijn, CEO

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