



Substances & Minerals of Concern Guideline

Cicor Technologies Ltd. and affiliated companies

Substances & Minerals of Concern Guideline	V 1.0
Cicor Group Compliance	dated August 1st, 2024

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Disclaimer:

Details an information shared hereunder shall be for internal use only. The present internal document outlines processes and procedures of the Company which shall not be shared externally. Should an externally party request any details of the below mentioned process please contact Cicor Group Compliance.

Introduction

Cicor Group strives to be a responsible member of society. All our entities are aware of their legal obligations and the applicable laws in relation with conflict minerals and materials. The purpose of this guideline is to share our commitment and our values related to any kind of conflict minerals, substances and materials.

We recognise that there are significant risks of negative impacts associated with extracting, trading, handling and exporting minerals and metals from conflict-affected or high-risk areas or the use of hazardous substances. In line with our strategic goals towards a sustainable future and occupational health and safety we are keen to reduce any form of pollutants for the protection of our natural environment.

As a part of our compliance and sustainability strategy we aim to identify environmental, social and governance risks and opportunities at an early stage of our value creation.



Scope

This policy is related to the following legal obligations and requirements:

- REACH Regulation (EC) No. 1907/2006 (REACH) - SVHC Candidate List
- REACH Regulation (EC) No 1907/2006 (REACH) Art. 56, Attachment XIV
- REACH Regulation (EC) No 1907/2006 (REACH) Art. 67, Attachment XVII
- ROHS Regulation 2011/65 (Annex II according to 2015/863)
- Dodd-Frank Wallstreet Reform Act Section 1502
- EU Conflict Mineral Regulation (EU) 2017/821
- Chemicals Prohibition Ordinance (ChemVerbotsV); attachment I
- EU POP Regulation (EC) No 2019/1021 Art. 3 attachment I & IV
- Responsible Minerals Initiative (RMI)
- U.S. Toxic Substances Control Act Section 6 (h)
- California Proposition 65
- Global List of Declarable Substances in the Automotive Sector (GADSL)
- International Material Data System (IMDS)
- Cicor Code of Conduct
- Cicor Supplier Code of Conduct

General requirements

In the relevant provisions as listed under art. 2 of this policy, substance bans, restrictions, limit values and declaration obligations, which must be fully complied by all suppliers. All delivery and services must be provided in accordance with these requirements. Compliance with these lists is an essential part of the terms of delivery.

Speak up

We are committed to maintain a trusting and open-minded environment promoting a Speak-Up culture. Our Integrity Line is a channel through which you may submit an indication of any behaviour which is against our standards and policies securely, confidentially, and anonymously. Incidents shared through our Integrity Line could relate to any other policy and standard the Company applies to. The use of our Integrity Line is entirely optional and voluntary. Those Speaking Up and raise concerns appropriately and in good faith will not face any consequences. We do not retaliate against anyone who raises concerns or against those who assist in investigations of suspected violations. Retaliation can take many forms, both direct and indirect, including harassment, exclusion from meetings, sanction, dismissal, or other discriminatory measures.

Definitions

Conflict Mineral

Conflict Minerals currently include cassiterite, tantalite/columbite and wolframite (the most common derivatives are tin, tantalum and tungsten) as well as mica, cobalt and gold, regardless of where the minerals are mined, processed or sold. The definition of conflict minerals can be found in the legislation [Dodd-Frank Wall Street Reform Act Section 1502; Conflict Minerals](#).

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

The purpose of this regulation is to ensure a high level of protection of human health and the environment. It shall apply without prejudice to Community workplace and environmental legislation. There are exemptions on medical, veterinary, alimentary, and cosmetic products, polymers and some on-site isolated intermediates. REACH is a regulation of the European Union with several subcategories (annexes) to be compliant with:

REACH Annex XIV: The substances listed in Annex XIV will be phased out of all products in time to meet the corresponding sunset date. These phase-out measures shall be handled and notified in the same way as any other partial amendments. The current list of substances in Annex XIV can be found [here](#):

Substances of very High Concern (SVHC)

A substance of very high concern (SVHC) is a chemical substance or part of a group of chemicals for which it has been proposed that its use within the European Union is subject to authorisation under the REACH regulation. A list of SVHC can be found [here](#):

Global List of Declarable Substances in the Automotive Sector (GADSL)

The GADSL is a globally harmonized declarable substance list for the automotive sector including substances that are expected or expected to be present in a material or a material part that remains in a vehicle at the point of sale. For more information please visit: www.gadsl.org.

International Material Data System

IMDS is the respective data system for the automotive industry, collecting, maintaining, and analysing as well as archiving all materials and substances used for automotive manufacturing. For more information please visit: www.mdssystem.com

ROHS Regulation 2011/65 (Annex II according to 2015/863)

An amendment (EU) 2015/863 to RoHS Directive 2011/65/EU adds four substances to the original six. These are Bis(2-Ethylhexyl) phthalate (DEHP), Benzyl butyl phthalate (BBP), Dibutyl phthalate (DBP), and Dibutyl phthalate (DBP). All are limited to 0.1% by weight.

Dodd-Frank Wallstreet Reform Act Section 1502

Section 1502 of the Dodd-Frank Act directs the U.S. Securities and Exchange Commission (SEC) to establish conflict minerals disclosure rules. The SEC adopted what is often referred to as the SEC Conflict Minerals Rule in 2012 and began mandating the reporting process in 2014 for the 2013 reporting year. The Dodd Frank Act Section 1502, part of the U.S. government's Dodd-Frank Wall Street Reform and Consumer Protection Act, signed into law in July 2010, requires publicly traded companies to ensure that the raw materials they use to make their products are not tied to the conflict in Congo, by tracing and auditing their mineral supply chains.

EU Conflict Mineral Regulation (EU) 2017/821

This EU regulation outlines supply chain due diligence obligations for importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.

Chemicals Prohibition Ordinance (ChemVerbotsV)

The Chemicals Prohibition Ordinance (in short: ChemVerbotsV) regulates the release of chemicals and mixtures with particularly hazardous properties. This is intended to prevent uncontrolled distribution and to reduce the risks to humans and the environment.

EU POP Regulation (EC) No 2019/1021 Art. 3 attachment I & IV

Based upon the precautionary principle, the objective of this Regulation is to protect human health and the environment from persistent organic pollutants by prohibiting, phasing out as soon as possible, or restricting the manufacturing, placing on the market and use of substances subject to the Stockholm Convention on Persistent Organic Pollutants, or the Protocol to the 1979 Convention on Long-Range Transboundary Air Pollution on Persistent Organic Pollutants, by minimising releases of such substances, and by establishing provisions regarding waste consisting of, containing or contaminated by any of those substances.

Responsible Minerals Initiative (RMI)

MI serves as an umbrella organization for the voice of progressive industry to support responsible mineral sourcing broadly and convenes stakeholders to continually shape dialogue and practices.

U.S. Toxic Substances Control Act Section 6 (h)

Under Section 6(h), the EPA has the authority to take action to reduce risks associated with certain PBT chemicals. This may include regulations to limit or phase out the production, processing, distribution, use, or disposal of these chemicals, as well as other risk management measures. The regulation applies to importer, exporter and manufacturers in the market of the United States of America.

California Prop 65

Proposition 65, officially known as the Safe Drinking Water and Toxic Enforcement Act of 1986, was enacted as a ballot initiative in November 1986. The proposition protects the state's drinking water sources from being contaminated with chemicals known to cause cancer, birth defects or other reproductive harm, and requires businesses to inform Californians about exposures to such chemicals.

Proposition 65 requires the state to maintain and update a list of chemicals known to the state to cause cancer or reproductive toxicity. The List of chemicals can be found here. ([Link](#))

Our documentation on Substances and Materials of Concern

At Cicor we share strong processes to identify, report and share information with our stakeholders. The Company shares its templates and information with customers and business partners on request or as part of contract.

Further information on REACH Regulation (EU) 1907/2006 documentation

As a contract manufacturer of electronic products and therefore according to the terms of the REACH directive, the Company defines as a so called "downstream user" of products and components. Cicor delivers exclusively non-chemical products, which in their intended and foreseeable use do not emit any substances. Therefore Cicor is not subject to any obligations regarding the registration of substances or the issue of safety data sheets for its products (Art. 7 (EU) 1907/2006). Regardless of the above and in the interest of its customers the Company has implemented necessary steps towards its supply chain to fulfil its obligations regarding the supplier information duty outlined in Art. 33 of the regulation. The company requires its suppliers to share information on the use and content of Substances of Very High Concern (SVHC) in the articles and products delivered. In case a customer product contains any substances listed in the candidates list of the European Chemical Agency (ECHA) the company will share respective information with the customer. In this case the company supports its customer in finding possible alternatives for the affected parts or processes. On customer demand a REACH certificate is issued for the delivered products.

With the implementation of the Waste Framework Directive by July 2018 on SVHCs Candidate list the Company can share the information that we do not place any products on the market containing substances as shared in the Candidate list. In case a customer requires declaration on the EU SCIP Database the company shares respective support in line with its Customer Due Diligence Guideline (CDD) Compliance Services.

Further information on ROHS Regulation 2011/65 documentation

The company shares strong processes in its supply chain to comply with ROHS Regulation 2011/65. Except for explicit customer demand on the contrary, all products manufactured and delivered by the Company do fully comply with the ROHS directive and do not contain any of the substances listed below by more than 0.1W%, respectively 0.01W% for Cd.

- Lead
- Mercury
- Cadmium
- Hexavalent Chromium
- Polybrominated biphenyls (PBB)
- Polybrominated diphenyl ether (PBDE)
- Bis (2-ethylhexyl) phthalate (DEHP)
- Butyl benzyl phthalate (BBP)
- Dibutyl phthalate (DBP)
- Diisobutyl phthalate (DIBP)

Extensive information is shared on request by the customer and in line with our Customer Due Diligence Guideline Compliance Services.

Further information on Dodd-Frank Wall Street Reform Act Section 1502 documentation

The company is not registered in any US Stock Exchange markets. Additionally, we do not have any production facilities in the territory of the United States of America. Therefore, we do not have any direct legal obligation on the use and restrictions of minerals as outlined in Section 1502 of the Dodd Frank Act. However, as a social responsible company sharing strong ethical standards and values the Company supports the rules outlined in Section 1502 of the Dodd-Frank Act. We ask our suppliers to review their supply chain in regard of the use of conflict minerals according to the obligations shared in the Dodd-Frank Act and notify us in case materials from conflicted areas are used for the products. If such case arise the Company will inform the customer immediately and provides possible alternative sources for the affected materials. Extensive further information is shared on request by the customer and in line with our Customer Due Diligence Guideline Compliance Services.

Further information on EU Conflict Mineral Regulation (EU) 2017/821

The EU conflict minerals regulations require EU importers of tin, tantalum, tungsten and gold, referred to as the 3TG to ensure their minerals are sourced responsibly and that the supply chain do not support armed conflicts or illegal practices. In line with the companies supply chain guideline we share respective data information on 3TG with up-to-date CMRT files on entity level where necessary and required. Data is also shared on entity level on our Company Integrity Next Profiles. Extensive further information is shared on request by the customer and in line with our Customer Due Diligence Guideline Compliance Services.

Further information on Cobalt & Mica

In line with the Responsible Mineral Initiative (RMI) the Company shares a standardized EMRT on entity level wherever necessary and applicable. The company's strategy on Responsible Mineral Sourcing is also supported by the Responsible Supply Chain Guideline and processes. Data are applicable on our Integrity Next Company Profiles for each entity. Extensive further information is shared on request by the customer and in line with our Customer Due Diligence Guideline Compliance Services

Further information on PFAS documentation

The company does not intentionally add Per- and polyfluoroalkyl substances to its products. On request of the customer this can be confirmed with our group wide PFAS Confirmation template. Extensive analyses on PFAS substances on product level can only be conducted on customer request and in line with our Customer Due Diligence Guideline Compliance Services.

Further information on TSCA Section 6 (h)

TSCA does apply to manufacturers and importers to the United States of America. The ban affects the following substances:

- Phenol, isopropylated phosphate (3:1) (PIP (3:1)) CAS 68937-41-7 (Complete ban)
- Decabromodiphenyl ether (DecaBDE) CAS 1163-19-5 (Complete ban)
- 2,4,6-Tris(tert-butyl) phenol (2,4,6-TTBP) CAS 732-26-3 (Limit value = 0.3% w/w).

The company shares details and confirmation on TSCA only on customer request and with the information that the confirmation is needed for their further product development. Confirmations and analysis are shared according to our Cicor Customer Due Diligence Guideline Compliance Services

Further information on California Proposition 65

The California Prop 65 regulation applies to manufacturers, distributors and retailers who sell consumer goods in the state of California. The Company does not directly share business in California and therefore is not directly obligated to file information on California Prop 65. However; in line with our Customer Due Diligence Guideline Compliance Services we support customers on their reporting whenever needed.

Should you need information or support on any other Conflict Mineral or Substances Regulation and documentation please contact Cicor Group Compliance as shared under Section 9 of this guideline.

Process to gather information

The company shares strong processes to gather further information where necessary with different internal channels used by each entity including but not excluding other channels, our supplier Integrity Next data, data from Silicon Expert or direct supplier feedback.

Employee Training & knowledge transfer

As a company we share regular trainings, at least annually, with our employees to keep them up-to-date on the regulations shared above. The Cicor Group Compliance department updates the communication templates and shares information with all affiliated companies whenever necessary. The templates and information are available on our group wide intranet for all employees.

Compliance request or further details needed

Should you have any questions on this guideline or on any Cicor Compliance Guideline please contact Cicor Group Compliance on compliance@cicor.com.

Reporting Templates

Reporting templates and declaration forms are available on the Intranet Compliance platform or directly requested with the Group Compliance Departement.

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