

# CONFLICT MINERALS POLICY

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## 1. Scope

This Conflict Minerals Policy (hereinafter "Policy") applies without exception worldwide to GEA Group Aktiengesellschaft, all companies affiliated with GEA Group Aktiengesellschaft (hereinafter collectively referred to as "GEA"), all employees at GEA and all suppliers of GEA. It specifies requirements for the supply of items containing tin, tungsten, tantalum, or gold to GEA, and defines and clarifies the tasks and responsibilities of all suppliers to GEA. GEA and its divisions, business units, regions, and countries as well as global / corporate functions shall cooperate in accordance with this Policy.

## 2. General guidelines

Minerals and metals play an important role in modern economies, as they are necessary to produce various products and their components. However, the exploitation, trade and transportation of metals and mineral ores can be associated with significant adverse impacts, including serious human rights violations and armed conflicts in the region of origin.

The extraction of tin, tungsten, tantalum, and gold, hereinafter also referred to as "the 3TGs" or "conflict minerals", is of particular relevance as, in the past, armed-conflicts and related human rights abuses have been directly or indirectly financed through the extraction, trade, handling and export of these minerals.

For the purposes of this Conflict Minerals Policy the term "conflict-free" means that the transport, extraction, and trade of any 3TG minerals contained in any item supplied to GEA did not violate any of the principles detailed in Annex II to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas ("OECD Due Diligence Guidance")<sup>1</sup>.

### 2.1. OECD Guideline

To promote company compliance with human rights and to prevent direct or indirect contribution to conflicts through mineral sourcing practices, the OECD has developed the OECD Due Diligence Guidance.

### 2.2. Due Diligence

Recognizing the risks for human rights associated with the sourcing of conflict minerals, GEA Group Aktiengesellschaft and its subsidiaries have adopted a policy on sourcing components and materials from companies that share our values regarding respect for human rights, integrity, and environmental responsibility. By implementing the recommendations of the OECD Due Diligence Guidance, GEA strives to only use 3TGs in its components whose extraction, transport, trade, manufacture, and export does not directly or indirectly finance and contribute to conflicts and related human rights violations, as detailed in Annex II to the OECD Due Diligence Guidance.

This policy is in line with GEA's broader policy regarding fair world trade, the Ten Principles of the UN Global Compact and the ILO core labour standards. Furthermore, implementation of the OECD Due Diligence Guidance enables GEA to:

- ensure compliance with any applicable regulatory obligations; and
- strive to help customers to fulfil their compliance with any regulatory obligations applicable to them.

<sup>1</sup>as published and amended from time to time by the OECD.

### 3. Supplier integration and comments

As a downstream producer of production and operation systems and components for various industries, GEA is several tiers away from the extraction of the 3TGs and relevant smelters or refiners. Due to this position in the supply chain, GEA requires appropriate upstream due diligence processes to ensure conflict-free sourcing of 3TGs.

To this end, GEA strives for full transparency regarding the sources of 3TGs within its supply chains. To foster its aim that 3TGs minerals contained in any item supplied to GEA originate from conflict-free sources only, a continuous enterprise-wide due diligence and risk management process is conducted, through which use, source and origin of all 3TGs is determined. In this process, GEA works closely together with suppliers and other relevant actors in the supply chain. Each supplier to GEA therefore shall:

- put in place appropriate supply chain due diligence policies and procedures concerning 3TGs and/or materials containing 3TGs which, as a minimum requirement, shall meet the standards set forth in the OECD Due Diligence Guidance and striving to ensure that 3TGs contained in items supplied to GEA originate from conflict-free smelters and refiners only;
- run a due diligence process for relevant suppliers on a yearly basis supported by a third-party service provider. Risks will be identified as a result of a yearly consolidated report.
- adopt a risk mitigation strategy to respond to identified risks in its supply chain which, as a minimum requirement, shall meet the standards set forth in the OECD Due Diligence Guidance;
- disclose to GEA all relevant information on due diligence and origin and sources of 3TGs in its supply chain through specified due diligence communications tools allowing to trace and evidence that 3TGs and 3TGs contained in items supplied to GEA originate from conflict-free smelters and refiners;
- promote sufficient standards of due diligence with its suppliers and other actors in its supply chain; and
- fully comply with GEA's "Code of Conduct for Suppliers and Subcontractors" which shall include the right of GEA to audit Supplier's compliance with the provision of the present Conflict Minerals Policy.

### 4. Non-compliance measures

In the event that a supplier fails to comply with this Policy, the contracting GEA company shall, without limiting any other available remedy, have the right to terminate purchase contracts with the respective supplier for material breach and or require the supplier to indemnify and hold GEA harmless from and against all costs, losses and damages resulting from such breach.

### 5. Whistleblower system

You are encouraged to report any ethical concerns or policy violations under GEA Whistleblower System <https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=7GEA1>.

Your report via this portal will be received by an external system of Business Keeper AG, Germany, which is independent of the GEA infrastructure. Only a restricted set of persons from the departments of Compliance,

Internal Audit and Human Resources has access to your report according to their specific areas of competence and has the responsibility for processing your report in a confidential manner.

## 6. Further questions

For further questions concerning this Policy, you are encouraged to contact the supply chain management teams with whom you regularly conduct business. Alternatively, you may send your questions to: [compliant-minerals@gea.com](mailto:compliant-minerals@gea.com)

## 7. Version history

Date	Review and Revision
2022	Review without changes
2023	Review without changes
21 June 2024	Description of due diligence process + minor changes added