



TOPSOE

# TOPSOE CONFLICT MINERALS SOURCING POLICY

JANUARY 2026

# CONFLICT MINERALS SOURCING POLICY

## Objective

At Topsoe, sustainability and a supply chain compliant to the principles of our standards, is an important driver to ensure the continuous success of our business, the long-term cooperation with our customers, and the development of the communities in which we operate.

This policy defines Topsoe's commitment to the responsible sourcing and procurement of mineral based raw materials, including the steps taken to establish management system/business processes, identify and mitigate risks, and communicate in a transparent manner.

## Scope

This policy covers procurement of raw materials containing minerals and metals defined as "Conflict Minerals" (EU Regulation 2017/821) including Tin, Tantalum, Tungsten and Gold (the so-called 3TG). Although Cobalt is not defined as a Conflict Mineral, this policy also covers sourcing of Cobalt containing raw materials which to a large extend originates in and around the same Conflict Region in Central as the 3TG and Topsoe requires the same due-diligence in

the sourcing of Cobalt. Other minerals and metals may on a risk and business-need basis adhere in part or in full to the same processes and principles.

## Applies to

All employees involved in the procurement of the raw materials covered by this policy, and functions involved in the statutory disclosure/reporting.

### 1 Conflict Minerals Sourcing Policy

#### 1.1 Background

The included policy is developed to ensure compliance with EU and US regulations on responsible sourcing of Conflict Minerals (Tin, Tungsten, Tantalum, and Gold, generally referred to as "3TG") as well as other raw materials where Topsoe deems extended due-diligence is required to ensure that Topsoe though sourcing of our raw materials do not contribute to financing of armed conflicts and human abuse.

On January 1, 2021, the EU regulation (EU Regulation 2017/821) regarding Conflict Minerals sourcing went into full force and effect across the EU. The EU Conflict Minerals Regulation requires that EU

importers of Conflict Minerals conduct due-diligence to ensure that the imported minerals are sourced responsible.

In the United States, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 covers the same 3TG minerals and have similar requirements for US publicly traded companies.

Although Cobalt is not considered a Conflict Mineral, Topsoe has due to the large fraction of the worlds Cobalt originating withing the same region in Central Africa as the 3TG, decided to use the same extended due-diligence in sourcing of Cobalt as for Conflict Minerals.

#### 1.2 Commitment

Topsoe A/S and Topsoe Inc. (hereafter referred to as "Topsoe" are committed to the responsible procurement of Conflict Minerals in our global supply chain and to comply with applicable law and regulations, including the EU Conflict Minerals Regulation and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. To the extent Topsoe purchases 3TG and Cobalt containing raw

materials, Topsoe requires that our suppliers conduct extended due diligence on their supply chain including adhering to responsible business standards for smelters and importers under the Responsible Minerals Initiative (RMI) (Responsible Minerals Initiative), and comply with applicable regulations. Topsoe will not purchase any raw materials that Topsoe has reason to believe contribute to financing of armed conflicts and human abuse.

Topsoe is committed to:

- Adopt the included Conflict Minerals Sourcing Policy as well as the associated Process Descriptions with detailed actions to ensure Topsoe's compliance with EU and US regulations as well as this policy.
- Building an internal management system to ensure compliance with laws and regulations including designated responsibility, record keeping and staff training.
- Collect data from our suppliers and assess risks in our supply chain including review of smelters and potential risk of the smelters supply from so-called Conflict Affected and High Risk Areas (CAHRA).

- Mitigate risk in our supply chain and track progress including cooperation with suppliers and monitoring of improvements.
- Report annually on due-diligence results including reporting to the Danish Competent Authority (Sikkerhedsstyrelsen) when required.

As a signatory to the UN Global Compact (UN Global Compact) Topsoe is further committed to align the company's activities to its Ten Principles.

### 1.3 Measures

Topsoe are taking measures to:

- Adopt the included Conflict Minerals Sourcing Policy as well as the associated Process Descriptions with detailed actions, based on recommendations from the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, to ensure Topsoe's compliance with the stated commitment described above;
- Ensure that all suppliers of 3TG and Cobalt containing raw materials provide full traceability on the origin of the raw materials to ensure that that Topsoe does not contribute to any armed conflicts and serious human abuse though the sourcing of our raw materials.
- Ensure that all our suppliers comply with our Supplier Code of Conduct, which sets social and environmental standards with the expectation of ensuring respect for human rights.

### 1.4 Records management

Maintain appropriate records for a minimum of five years relating to the purchase of minerals and metals in scope in SAP and on a designated Global Procurement SharePoint (GP Responsible Minerals Reporting Site – Global Procurement).

### 1.5 References

Topsoe Code of Conduct  
Topsoe Supplier Code of Conduct  
Global Procurement Policy  
Topsoe Sustainability Policy  
Standard Language on POs for supply of Tungsten

Topsoe Processes:

- 01.01 – Conflict Minerals Reporting Template (CMRT) from Supplier
- 01.02 – Conflict Minerals Reporting Template (CMRT) for Customers
- 01.03 – Due-diligence Reporting to the Danish Competent Authority (Sikkerhedsstyrelsen) on Import of Conflict Minerals

### Change log

Updated to align with optimized internal business procedures which aim to ensure compliance with the EU Conflict Minerals Regulation effective 1 Jan 2021.  
Vers. 5.0: Updated to align with updated internal business procedures and process descriptions and new checker and approver.