



**TOPSOE**

# **RESPONSIBLE MINERALS SOURCING POLICY**

**MAY 2021**

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## Objective

At Topsoe, sustainability including corporate social responsibility (CSR) 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 the performance of its supply chain.

## Scope

This policy covers procurement of raw materials containing minerals and metals defined as "Conflict Minerals" (EU Regulation 2017/821). In addition raw materials containing cobalt are covered by this policy. Other minerals and metals may on a business-need basis adhere in part or in full to the same processes or principles.

## Background

On January 1, 2021, the EU regulation (EU Regulation 2017/821) regarding conflict minerals (tin, tungsten, tantalum, and gold, generally referred to as "3TG") has come into full force across the EU. The EU Conflict Minerals Regulation requires EU companies to ensure they import these minerals and metals from responsible and conflict-free sources only.

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 companies.

Responsible sourcing of cobalt is part of the voluntary Responsible Minerals Initiative program (Responsible Minerals Initiative) and a focus area for Topsoe.

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.

## Commitment

Topsoe is committed to the responsible procurement of conflict minerals in our

global supply chain and to comply with applicable requirements, such as the EU Conflict Minerals Regulation. To the extent Topsoe purchases 3TG and cobalt based minerals/raw materials from our suppliers, Topsoe requires that our suppliers inform us regarding the origin of such minerals/metals and declare that they adhere to responsible business standards for smelters and importers, specifically the Responsible Minerals Initiative, and comply with applicable regulations. Topsoe will not acquire any raw materials that Topsoe has reason to believe originate from conflict affected areas unless such materials are declared as conflict free.

Topsoe is committed to:

- Adopt Conflict Minerals Procedures with detailed actions to ensure Topsoe's compliance with the stated commitment described above
- Identify all Topsoe catalysts impacted by 3TG
- Not buy raw materials containing Conflict Minerals originating from conflict mines
- Work with our suppliers to ensure that 3TG contained in the products and materials supplied to Topsoe originate from conflict free sources

- Maintain records of the documentation of compliance of our suppliers
- Engage with our customers regarding their disclosure obligations
- Publicly disclose relevant information in accordance with EU requirements

## Measures

Topsoe is taking measures to:

- Adopt Conflict Minerals Procedures with detailed actions, based on 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;
- Require that any supplier of 3TG or cobalt based minerals/metals inform us regarding the origin of such minerals and declare that they comply with applicable regulations and adhere to business standards for smelters and importers, specifically the Responsible Minerals Initiative;
- Require our suppliers to comply with our Supplier Code of Conduct, which sets social and environmental standards with the expectation of ensuring respect for human rights.