



Wrocław, 15.02.2022

SUPPLY CHAIN DUE DILIGENCE POLICY

Issue I

Introduction

WOLFTEN Sp. z o.o. is a private organization operating, inter alia, in the aviation industry as a distributor of metallurgical products and components made of non-ferrous metals. The long-term objective of the company's development strategy is to take a significant position on the market of suppliers of metallurgical products and components made of non-ferrous metals. In the area of the company's activity there are also materials belonging to the so-called 3TG group or "conflict minerals". For this reason, bearing in mind the respect for human rights affected by the extraction of conflict minerals, WOLFTEN Sp. z o.o. is committed to adopting, widely disseminating and including in contracts or agreements with suppliers this policy on responsible sourcing of minerals from conflict-affected and high-risk areas and in compliance with supply chain due diligence.

The company undertakes to refrain from any action contributing to the financing of conflicts, to comply with UN resolutions imposing appropriate sanctions, and to comply with national laws implementing such resolutions.

The organization undertakes to act in accordance with the Regulation of the European Parliament and the EU Council 2017/821 of May 17, 2017. "Establishing supply chain due diligence obligations for EU importers of tin, tantalum and tungsten, their ores and gold from conflict-affected and high-risk areas" and in line with the OECD guidelines on metal supply chain due diligence.

Scope

This conflict material policy applies to all WOLFTEN operations, all employees and all suppliers. It specifies the requirements for the supply of tin, tungsten, tantalum and gold materials



and explains the tasks and obligations of suppliers towards WOLFTEN Sp. z o.o. Cooperation with suppliers and business partners in the above-mentioned scope must be based on this Policy.

WOLFTEN's due diligence obligations

Recognizing the human rights threat in the supply of minerals from conflict-affected and high-risk areas, WOLFTEN is committed to:

Regarding to serious abuses activities relating to the extraction, transport or trade of minerals:

1. When sourcing minerals from or operating in conflict-affected and high-risk areas, we will not tolerate, benefit, or contribute to, the acts listed below:

- a) all forms of torture and cruel, inhuman and degrading treatment;
- b) any form of forced or compulsory labor;
- c) the worst forms of child labor;
- d) other serious violations such as sexual violence;
- e) war crimes or other serious violations of humanitarian law, crimes against humanity or genocide.

Regarding the management of risks related to serious fraud:

2. We will suspend or terminate cooperation with suppliers of raw materials if it is determined that there is a risk that suppliers obtain their supplies from any entity that commits serious abuses listed in point 1.

Regarding to risk management related to direct or indirect support to non-state armed groups:

3. Cooperation with raw material suppliers will be immediately suspended or terminated if it is determined that there is a reasonable risk that the suppliers source from any entity that provides direct or indirect support to non-state armed groups or is associated with such entity.



Regarding to public or private security forces:

4. We agree to eliminate direct or indirect support to public or private security forces that illegally control mines, transport routes and upstream in the supply chain; unlawfully tax or extort money from intermediaries, exporting companies or international traders.

5. If we or any other enterprise in our supply chain enter into a contract with public or private security forces, we undertake to use or require the services of such armed forces, in accordance with optional principles of security and human rights. In particular, we will support or take steps to adopt a screening policy to ensure that security forces known to be responsible for human rights violations are not employed.

6. We will work with central or local government authorities, international organizations and civil society organizations to contribute to the development of solutions on how to improve the transparency, proportionality and accountability of payments to public security forces for ensuring security.

In relation to risk management related to public or private security forces:

7. In line with the specific position of the company in the supply chain, we will promptly develop, adopt and implement a risk management plan together with raw material suppliers and other stakeholders to prevent the risk of direct or indirect support to public or private security forces, to mitigate this risk, if that there is such a reasonable risk. In such cases, cooperation with raw material suppliers will be terminated or suspended after unsuccessful risk mitigation attempts within 6 months of the adoption of the risk management plan.

Regarding to money laundering:

8. We will support or take action to contribute to the effective elimination of money laundering, when a reasonable risk of money laundering from the extraction, trade, transport or export of minerals related to the illegal levying of taxes or the enforced collection of minerals is identified. at



access points to the mines, along transport routes or at points where minerals are traded by raw material suppliers, or the risks associated with such activities.

Regarding to managing the risk of bribery and misrepresentation of the origin of minerals, money laundering:

9. In line with the company's special position in the supply chain, we are committed to working with suppliers, central or local government authorities, international organizations, civil society and affected third parties to improve and track performance to prevent the risk of negative effects. or reduce that risk by taking measurable actions within a reasonable timescale. After the adoption of the risk management plan, an additional risk assessment will be performed on those risks that need to be mitigated. If there is no significant and measurable improvement within 6 months, we will suspend or terminate our cooperation with raw material suppliers for at least 3 months after unsuccessful attempts to reduce the risk.

Reporting system for concerns and irregularities

WOLFTEN encourages all interested parties to report any doubts and ethical concerns as well as irregularities and violations of the supply chain due diligence policy by sending an e-mail to the following address: m.siemieniec@wolften.pl containing the form.

The message will be automatically forwarded to the person responsible for considering the reported concerns and irregularities.

Activity reports of the supply chain due diligence process

WOLFTEN is committed to making the Annual Activity Report of Supply Chain Due Diligence (3TG) publicly available on its website.

Maciej Konys
Chairman of the Board