



Simon Group – Declaration on conflict minerals – Conflict mineral policy

As a global business partner, Simon Group (with its companies Karl Simon GmbH & Co. KG / Simon Sinterlutions GmbH & CO. KG / Betek GmbH & Co. KG / Betek Tools Taicang Ltd. / Betek Tools Inc.) is aware of the responsible, conflict-free and sustainable procurement of products and raw materials. Compliance with all applicable laws and ethically sound conduct serves as the basis of our actions.

In cooperation with our management, executives, employees and business partners, we strive to contribute to a transparent, honest, responsible and sustainable supply chain in the spirit of the "EU Conflict Minerals Regulation".

Critical raw materials primarily include the well-known conflict minerals tin, tantalum, tungsten and gold. In addition, the Simon Group also considers cobalt to be a critical raw material.

The Simon Group has set itself the goal of refraining from directly or indirectly purchasing conflict minerals that promote or even finance human rights violations and conflicts by armed groups. We also expect this from our business partners, suppliers and their subcontractors.

For the purpose of achieving this goal, we employ the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Template (EMRT) to request complete information from our suppliers on the smelters and the origin of the individual minerals.

If necessary, we shall request further reports, certificates, audit results or other written confirmations from our suppliers that demonstrate the respective due diligence in the supply chain.

In addition, we also aim to use our Code of Conduct to promote a sense of risk awareness for conflict minerals and to encourage responsible behavior.

Should discrepancies in the supply chain come to light, we will question, suspend or even terminate our business relationship with this supplier, depending on the severity of the risk.

In the case of intentional and serious offenses, we will inform the appropriate authorities.