



## WTB Group – Policy on Responsible Sourcing of Minerals (Tungsten)

WTB Group conducts its business with the objective of maintaining responsible, transparent and lawful supply chains. This policy sets out the principles that guide our expectations towards suppliers and business partners and reflects our commitment to ethical conduct and respect for human rights.

WTB Group operates as a small importing and trading company and does not process or refine minerals. Imports of tungsten are carried out in limited quantities and not on a continuous annual basis. Nevertheless, we acknowledge our responsibility to act in accordance with applicable legal requirements and internationally recognised standards of responsible sourcing.

### Regulatory Framework

Where applicable, WTB Group aligns its practices with the requirements of the EU Conflict Minerals Regulation (EU) 2017/821, which establishes supply chain due diligence obligations for Union importers of tin, tantalum, tungsten and gold originating from conflict-affected and high-risk areas (CAHRAs).

This policy is further informed by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and is implemented in a manner that is appropriate and proportionate to the size, structure and risk profile of our company.

### Commitment to Human Rights and Responsible Business Conduct

WTB Group is committed to respecting internationally recognised human rights and to conducting business in an ethical and responsible manner. We seek to avoid sourcing minerals that may be associated with serious adverse impacts as described in Annex II of the OECD Guidance.

In particular, WTB Group commits to:

- refraining from any activities that may directly or indirectly contribute to the financing of armed conflict;
- complying with applicable United Nations sanctions and relevant national legislation.

We do not tolerate, nor do we knowingly benefit from or contribute to, any of the following:

- torture or cruel, inhuman or degrading treatment;
- forced labour, compulsory labour, child labour or slavery;
- serious human rights abuses, including sexual violence;
- war crimes, crimes against humanity or genocide.

WTB Group does not support, directly or indirectly, non-state armed groups through the extraction, transport, trade or export of minerals.

We also seek to avoid any involvement with public or private security forces that illegally control mining sites or transport routes, or that engage in extortion or illegal taxation of minerals or supply chain actors.

### **Risk-Based Due Diligence Approach**

Given the limited scale of our operations, WTB Group applies a risk-based and proportionate due diligence approach. This includes:

- maintaining basic internal oversight of suppliers and transactions;
- assessing available information on supply chain risks where relevant;
- taking appropriate action if credible indications of significant risk are identified, which may include enhanced inquiries or suspension of cooperation.

Where no imports are conducted in a given year, no supply chain due diligence activities under the Regulation are required for that period.

### **Integrity and Anti-Corruption**

WTB Group maintains a zero-tolerance approach to corruption. We do not offer, promise, give or accept bribes or other improper advantages.

We oppose any attempt to misrepresent the origin of minerals or to falsify information relating to taxes, fees or royalties paid in connection with mineral extraction or trade.

## **Transparency and Contact**

This policy forms part of WTB Group's public commitment to responsible sourcing and is made available on our website in accordance with applicable disclosure requirements.

Any concerns relating to unlawful conduct or potential violations of this policy may be reported to: [compliance@wtb-group.de](mailto:compliance@wtb-group.de)

## **Final Provisions**

This policy is implemented in compliance with applicable laws and regulations and shall not be interpreted in a manner that creates contractual obligations or rights for third parties.