

Sourcing policy for the avoidance of conflict minerals in accordance with the Dodd-Frank Act (Section 1502)

(Voluntary commitment for companies without a direct reporting obligation)

1. Purpose and scope of application

This voluntary sourcing policy describes the measures Lenord+Bauer takes to ensure that no conflict minerals (tantalum, tin, tungsten, gold – "3TG") from conflict-affected regions enter our supply chain. Although Lenord+Bauer is not directly subject to the reporting obligations of the Dodd-Frank Act, we acknowledge our responsibility as a supplier to companies with direct reporting obligations.

By implementing the provisions of the current Code of Conduct of the Verband der Bahnindustrie (VDB), Lenord, Bauer & Co. GmbH demonstrates its commitment to corporate responsibility.

2. Definition of conflict minerals

Conflict minerals are:

- **Tantalum** (from coltan)
- **Tin** (from cassiterite)
- **Tungsten** (from wolframite)
- **Gold**

These minerals are considered conflict-affected when their mining or trade finances armed groups, promotes human rights violations, or originates from mines and smelters against which legitimate ethical or environmental concerns have been raised.

3. Responsible sourcing strategy

Lenord+Bauer takes responsibility within the scope of its own capabilities

- To source, wherever possible, no materials that demonstrably contain conflict minerals from affected regions.
- To work, wherever possible, with suppliers who can demonstrate a conflict-free supply chain.
- To take into account the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

4. Supplier requirements

Our suppliers are requested to:

- Disclose the origin of the 3TG minerals used (e.g. through the Conflict Minerals Reporting Template – CMRT).
- To work only with smelters and refineries certified as conflict-free by the Responsible Minerals Initiative (RMI).

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- To participate in surveys on the origin of materials when required and to provide complete information.

5. Risk management and escalation

Should it be determined that a supplier is in violation of this policy or is not taking sufficient measures to avoid conflict minerals, we reserve the right to:

- Review the business relationship
- Initiate risk mitigation measures
- Terminate the business relationship if necessary

6. Transparency and communication

Lenord+Bauer will review and update this policy on a regular basis. We are available to our customers and partners for inquiries and to provide support with their own reporting obligations.

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