

Conflict Minerals Policy

In 2010, the U.S. Congress adopted legislation on “conflict minerals” under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. This provision aims to reduce violent conflicts in the Democratic Republic of Congo and neighboring countries, where such minerals are extracted.

GLÜCK Industrie-Elektronik GmbH (GIE) supports industry-wide efforts to identify, reduce, and eliminate the use of conflict minerals originating from affected regions that finance or benefit groups committing human rights violations.

As a manufacturer of electronic assemblies, GIE is fully aware of its global responsibility to protect human rights and ensure environmental safety and sustainability.

To meet these obligations, the owner of GLÜCK Industrie-Elektronik GmbH has established a **Conflict Minerals Compliance Program** to review the use of conflict minerals in our products.

GIE expects all suppliers to implement and support compliance with applicable rules and regulations regarding the procurement of minerals from conflict and high-risk areas. Suppliers are required to source minerals exclusively from reliable, conflict-free, and sustainable sources.

Implementing due diligence throughout the supply chain is essential. Therefore, GIE obliges all suppliers to provide the necessary reports, documentation, and written confirmations upon request.

For selected suppliers, GIE conducts regular surveys to ensure transparency regarding the components supplied and to verify that they originate from certified mines and processing facilities.

If GIE determines that a supplier has failed to take reasonable steps to comply with this policy, GIE reserves the right to take appropriate action, including the possible termination of the business relationship.

Neckartailfingen, Germany, December 2025