Report on Conflict Minerals 2025

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Legal information

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https://www.tribotecc.com/app/uploads/2022/02/tribotecc-gmbh-supply-chain-policy-for-conflict-minerals.pdf

Equality:

The masculine form of address is used in this report for ease of reading. However, all genders are, of course, always referred to and addressed.

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Foreword

The Conflict Minerals Report ("CMR") of Tribotecc GmbH (referred to below as "Tibotecc", "we" or "our") is prepared in compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("CAHRA-OECD Guidance" or also "OECD Guidance") and the Responsible Minerals Initiative ("RMI") Guidance for Preparing Public Due Diligence.

Section 1: Introduction and company overview

Tribotecc is a subsidiary of Treibacher Group, the company's headquarter is in Arnoldstein, Austria and the sales office is located in Vienna, Austria.
Tribotecc is the world's largest manufacturer when it comes to various special metal sulfides.
As functional additives, they are used in brake pads and clutch facings as well as in lubricants, polymers, powder metallurgy, abrasives, batteries and within a variety of other fields.
The company develops, manufactures and distributes both synthetic and natural metal sulfides using a unique, patented synthetic manufacturing process. Tribotecc has the world's largest capacities for various special metal sulfides.
For more details, see https://www.tribotecc.com
For the material tin, we operate as Union importers in accordance with the criteria of EU Regulation 2017/821 (Regulation laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas).
Tin Metal is the raw material for the production of tin powder and tin sulfides which are used as additives in sintered or resin bonded friction materials.
To implement the process of ensuring due diligence into the existing integrated management system, in 2021 we defined a cross-divisional Conflict Minerals Team and prepared corresponding specification documentation on the subject of due diligence.

Section 2: Appropriate investigation of the country of origin

We have defined the following measures and regulations to establish an appropriate internal system for continuous investigation of the country of origin:

Corporate policy on the supply chain:

Tribotecc has developed a supply chain policy to avoid using conflict minerals that directly or indirectly finance or benefit armed groups and/or are associated with other serious human rights violations in high-risk and conflict-affected regions. This guideline is aligned with the third edition of the CAHRA-OECD Guidance and covers all risks identified in Annex II of the OECD Guidance. The supply chain policy for conflict minerals has global scope and has been reviewed and approved in accordance with internal requirements. It is available to interested parties via the website.

Code of Conduct for Suppliers:

To establish the ethical and conduct requirements in our supply chain in addition to the quality requirements for our suppliers, we have drawn up a separate Code of Conduct for Suppliers. This is intended to support us in our efforts to further develop our suppliers.

Corporate strategy for the procurement of conflict minerals:

In the course of integrating the conflict materials issue into our existing management system, we also defined the corporate strategy in this regard. It was defined that material will only be purchased from raw materials suppliers that are listed with RMI or have a valid CMRT.

Establishing criteria for supplier selection and internal checking systems:

The corporate strategy referred to above is anchored in the corresponding specification documents of the management system and, in addition to the materials procurement process, also regulates the criteria for recruiting new suppliers. Before entering into business relationships with a new supplier, we thoroughly check whether this potential supplier meets all legal requirements and also our internal requirements (such as quality requirements, ethics and conduct requirements, etc.). We communicate our supply chain policy to all our suppliers and maintain an active exchange with them. In the course of regular incoming raw materials inspection, among other things we also closely check completeness of the delivery documents.

Annual supplier status review:

The national requirement according to the current Mineral Raw Materials Act stipulates that once a year Union importers must communicate the imported quantities and sources of supply (origin and provenance of minerals and metals) to the Federal Ministry using the "Reporting of Import Figures" template. The sources of supply used and their status (RMI listed) as well as the up-to-dateness of the CMRT are verified during the preparation of this report.

Section 3: Creation of the due diligence framework

In line with our own Code of Ethics and Conduct, we see our commitment in the supply chain of the materials we produce as more than just a unilateral responsibility. Over the past few years we have already taken many measures to ensure that this responsibility is not limited merely to relationships with our customers and suppliers. Thus, we also see our due diligence as a social responsibility for safeguarding our location. In 2021, we expanded the framework of our operational due diligence when the conflict minerals topic was included in both our Code of Ethics and Conduct and our integrated management system.

Section 4: Due diligence performed

In March 2022, we commissioned an external company to evaluate our due diligence measures. As a partner of the Responsible Minerals Initiative ("RMI"), the RCS Global Group is a global market leader in responsible sourcing audits. The review focused on the implementation of the OECD Due Diligence Guidance on Promoting Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas. Furthermore, the internal requirements for proper transmission of the required data were defined in accordance with the national requirements stipulated by the Raw Materials Act Amendment, Section 222c (Subsequent checking when importing tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas) which came into force on January 1, 2021.

Section 5: Due diligence results

The RCS Group's external audit report (3rd party) is available for download on the website. https://www.tribotecc.com/app/uploads/2022/06/tribotecc-gmbh-conflict-minerals-audit-statement-2022.pdf

The results of the internal due diligence review are part of our management review system and are reported to the Management Board by the person responsible. In summary, in line with applicable international and national regulations, this CMR is prepared annually and made available accordingly.

In 2022, the Federal Ministry of Finance (BMF) conducted an in-depth review of imports for 2021. The management system and the underlying risk analysis were also evaluated. The audit was successfully completed in October 2022.

In February 2026, TRIBOTECC submitted the import volumes for 2025 to the Austrian Federal Ministry of Finance (BMF). The verification of the customs data was completed without any objections in April 2026.

TRIBOTECC is also audited according to ISO 9001 and ISO 14001 by an accredited provider. We reaffirm our commitment to supply chain policy and have implemented internal supply chain management procedures, which include the raw materials due diligence process.

Section 6: Efforts to determine origin

As already described in Section 2 under the item on internal checking systems, a review of the delivery documents is carried out during the incoming raw material inspection. The documents are attached to the purchase file in accordance with internal requirements.
Raw material deliveries without a clear origin are not accepted and are therefore not used for our production either.

Section 7: Risk minimization steps

Tribotecc intends to take the following steps to continuously improve our due diligence process:
Creating an awareness of responsibilities among all supply chain stakeholders. As a first step, we intend to communicate the Code of Conduct for Suppliers that we have defined.
In addition, measures will be taken within the corporate group to support the establishment of due diligence in the individual companies and to facilitate cooperation on this topic. This includes exchanging information and mutual internal auditing.
Although Tribotecc does not source minerals directly from conflict-affected and high-risk areas (CAHRA), we have an open channel) to communicate potential grievances: TT_Conflict_Minerals@tribotecc.com

In accordance with internal quality standards, there is a team dedicated to resolving any problems that may arise.

In the 2024 reporting year, no reports were received in connection with due diligence in dealing with conflict minerals.

Conclusion

Of course, we are also prepared to support our customers in their due diligence efforts and provide them with relevant documents upon request at any time. By publishing this report, we also want to emphasize to our suppliers the importance of sourcing materials from conflict-free sources.