



 Foxway

Policy

Conflict minerals policy

v 2.0

Foxway Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas

Recognizing that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas and recognizing that we have the responsibility to respect human rights and not contribute to conflict, Foxway commits to adopt, widely disseminate and incorporate in contracts and/or agreements with suppliers the following Policy on Responsible Sourcing of Minerals from Conflict-Affected and High-Risk Areas.

This Policy applies to all employees of Foxway Group including all its subsidiaries and its affiliates (in the following "Foxway").

This policy should be read together with Foxway other policies.

1. Principles

Foxway commits to refraining from any action which contributes to the financing of conflict, and commits to comply with relevant United Nations sanctions, resolutions, or, where applicable, domestic laws implementing such resolutions.

1.1 While sourcing from conflict-affected and high-risk areas, we expect our Suppliers to neither tolerate nor by any means profit from, contribute to, assist with, or facilitate the commission by any party of:

- i. any forms of torture, cruel, inhuman and degrading treatment;
- ii. any forms of forced or compulsory labour;
- iii. child labour;
- iv. other gross human rights violations and abuses such as sexual violence;
- v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

1.2 Foxway will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals.

1.3 Foxway demands that our Suppliers work proactively to ensure that minerals (such as, but not limited to, tungsten, tantalum, tin, and gold) in their products and supply chain are responsibly sourced. All Foxway OEM suppliers and spare part providers with contracts worth more than 100 000€ shall have a conflict mineral policy and due diligence process in place, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and communicate their policy to sub-suppliers.

1.4 Should any breaches of Foxway's Conflict Mineral Policy and/or Supplier Code of Conduct be identified, Foxway reserves the right to suspend the cooperation with the Supplier effected immediately. The Supplier is furthermore expected to accept and implement a Corrective Action Plan created by Foxway within three months of any breach being identified. The failure to do so might result in termination of contract.

2. Grievance Mechanism

Any interested party is welcome to voice concerns regarding the circumstances of extraction, trade, handling and export of minerals used in Foxway's products in conflict-affected and high-risk areas through Foxway's whistleblowing function, managed by an independent third-party through an external website: <https://foxway.trumpet-whistleblowing.eu/>.

All grievances raised are thoroughly investigated by the whistleblowing committee. Foxway guarantees anonymity and ensures that no one using the whistleblowing function is threatened by discrimination or punishment.

3. Implementation and monitoring

3.1 The General Counsel is responsible for overseeing the implementation of this policy.

3.2 Regular audits and assessments will be conducted to monitor compliance with this policy and identify areas for improvement.

3.3 This policy will be revised once a year by the General Counsel, to assure compliance with external and internal guidelines.

Review and Approval

This Policy has been reviewed and approved by

Version	Approval date	Document owner	Approved by
v 1.0	2023-10-20	Sonia Braska	Kent H. Jeppesen
v 1.5	2024-04-08	Sonia Braska	Stefan Nilsson
v 2.0	2024-11-04	Sonia Braska	Oskar Arndt, GC