



CONFLICT MINERALS POLICY

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Responsible sourcing

HORSE is a company that machines and assembles engines and gearboxes, composed mainly of aluminum and steel but also of many other materials.

HORSE establishes this policy to reinforce its responsible management of raw material procurement through the purchase of parts, with the aim to reduce our negative impacts in the environment and people through the entire supply chain.

Conflict Minerals

In this regard, we have identified some minerals that by their origin can contribute to perpetuating armed conflicts, violence and human rights violations.

As defined by EU and United States legislation, conflict mineral means any mineral or its derivatives determined to be financing conflict in Democratic Republic of the Congo or an adjoining country (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia)

The association [Responsible Mineral Initiative](#) identifies as Conflict Mineral the 3TG-**Tantalum, Tin, Tungsten and Gold** and the extended Minerals- **Cobalt and Mica**.

HORSE position

HORSE follows the UE regulation to ensure that smelters and refiners of 3TG source from non-conflict regions finish with both human rights violations of local communities and mining workers and illegal exploitation of minerals.

Horse is aware of the potential risk coming from its supply chain, for this reason HORSE requires all suppliers to only use minerals and metals whose extraction, processing, trade and transportation has not directly or indirectly resulted in human rights abuses, unethical business conduct (e.g. corruption), severe environmental harm or provided funding for armed conflict.

To ensure this Horse ask to its suppliers to identify the sourcing of the materials they acquires to avoid the purchasing, use and sell of conflict minerals, implement due diligence processes ensuring their traceability

HORSE Due diligence on Conflict Minerals

As recommended by the OECD in its document 'Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas', HORSE commits to establish the following measures:

- 1. To track and monitor the supply chain:** Following the recommendations of RMI (Responsible Minerals Initiative), Material Data Sheet (MDS) registration is mandatory in due time for all parts and materials delivered to HORSE, regardless of design date or application of the part or material and including spare parts and customer adaptation.



For 3TG (Tin, Tungsten, Tantalum and Gold), suppliers shall only use smelters validated by a third party to be conformant with RMI's (Responsible Minerals Initiative), Responsible Minerals Assurance Process (RMAP) and report via CMRT (Conflict Mineral Reporting Template) annually or upon request by the Buyer

- 2. To establish measures if 3TG, Cobalt and Mica from conflict areas are detected:** In the event of detecting the origin of any of these minerals from conflict zones directly from its suppliers or through their smelters or refiners, HORSE is committed to establishing a corrective action plan and to find alternative sources of supply of the minerals in question.

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- 3. To report publicly:** At HORSE, we are committed to publicly reporting on the minerals we use in our products and their origin.

HORSE also values the possibility of forming partnerships or participating in projects with NGOs to effectively address these risks and promote responsible sourcing practices.

References

- Responsible Minerals Initiative
- 'Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas'- OCDE
- Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 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.
- Dodd Frank Act

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