

## CONFLICT MINERALS & EXTENDED MINERALS DUE DILIGENCE STATEMENT

### Our commitment

Harwin plc is committed to responsible sourcing and to supporting efforts to avoid contributing to conflict, serious human rights abuses, or other severe impacts associated with mineral extraction and trade.

### This statement addresses:

- tin, tantalum, tungsten and gold (3TG), and
- selected extended minerals relevant to Harwin products: cobalt, nickel and copper.

### Scope

This statement applies to Harwin plc and relevant subsidiaries and covers products manufactured and/or supplied by Harwin that may contain 3TG and/or cobalt, nickel and copper.

### Programme status

Harwin is continuing to develop and strengthen its responsible minerals due diligence programme. Work underway includes formalising supplier communications and expectations, improving the quality and coverage of supplier disclosures, and strengthening internal governance and risk evaluation processes.

### Due diligence approach

Harwin's due diligence activities are intended to be consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Harwin collects supplier disclosures using recognised industry templates, including:

- the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) for 3TG, and
- the RMI Extended Minerals Reporting Template (EMRT) for cobalt, nickel and copper (where applicable).

Our current CMRT and EMRT are available on our website here:

<https://www.harwin.com/compliance>

To support these activities, Harwin engages an independent Compliance Due Diligence Partner to:

- undertake supplier due diligence outreach on Harwin's behalf, and
- assist Harwin in improving visibility of supply chain exposure and potential risk.

Harwin remains responsible for its programme decisions and risk management actions, using information obtained through supplier engagement and third-party support.

## Data collection and limitations

Harwin relies on information provided by suppliers and upstream parties.

As Harwin is a downstream manufacturer and does not typically purchase raw ore, Harwin may not have direct relationships with smelters/refiners or mines.

Supplier information may be provided at company level or product-family level rather than specific to Harwin part numbers. Harwin recognises these limitations and is working to improve transparency and the robustness of supplier reporting.

Where suppliers provide company-level disclosures, the smelters and refiners they declare may relate to their wider operations and are not necessarily confirmed as being used in products supplied to Harwin. As a result, smelters and refiners may appear on Harwin's CMRT and EMRT that may not be present in Harwin products.

## Risk management and continuous improvement

Where supplier information indicates incomplete disclosure or potential risk, Harwin will seek additional clarification and will work with suppliers to improve data quality and due diligence practices over time.

Harwin intends to continue strengthening its responsible minerals programme, including the ongoing collection of relevant disclosures and enhanced supplier engagement.

## Contact

If you have any questions about this statement or Harwin's responsible minerals programme, please contact the Harwin Compliance Team via [compliance@harwin.com](mailto:compliance@harwin.com)

## John P Collins

Product Environmental Compliance Specialist

This statement is based on reasonable enquiry and due diligence activities undertaken by Harwin plc within its supply chain and reflects the information available to us at the time of publication. It represents our best knowledge as of the issue date. This statement is issued electronically and is valid without a handwritten signature. It remains valid until superseded. Harwin operates an ongoing development and review programme, and information may change as new data becomes available. For updates or further clarification, please contact [compliance@harwin.com](mailto:compliance@harwin.com)