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neways

Neways Electronics International N.V.

Conflict Minerals Policy

In line with Neways' SDG Target 8 and 12 we continuously improve on our sustainable supply chain and provide transparency regarding Conflict Minerals.

- SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; and
- SDG 12: Ensure sustainable consumption and production patterns.

Neways follows the EU and US directives and international regulations regarding Conflict Minerals. In the selection and management of our suppliers we expect our suppliers to manage towards a Conflict Minerals free supply chain in case of risks together with our customers and/or suppliers we will mitigate the risks towards a sustainable supply chain. Continuously we will exercise due diligence, as specified in the Organization for Economic Co-operation and Development (OECD), of the supply chain and inform our suppliers and customers accordingly.

Background

At many sites in the Democratic Republic of the Congo (**DRC**) and the nine adjoining countries sharing an internationally recognized border with the DRC, including Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (also known as the **Covered Countries**), armed groups illegally tax, extort, and force civilians to work. Miners, including children, work up to 48-hour shifts amidst deadly mudslides and tunnel collapses. Rebel groups use rape and violence to control the local population and use profits from mining operations of so called **Conflict Minerals** to continue financing their operations. Conflict minerals are also known as 3TG: Tantalum, Tin, Tungsten and Gold. In addition there is also an extended mineral list that includes Mica and Cobalt.

The United States Securities and Exchange Commission (SEC) issued its final rules regarding Conflict Minerals as defined in and required by section 1502 of the Dodd-Frank Wall street reform and Consumer Protection Act. These rules apply to many of Neways' customers which requires them to investigate the origin the Conflict Minerals in their supply chain.

Neways' approach

Neways supports its customers in the due diligence of their supply chain by:

- Deploying this Policy throughout our supply chain and create awareness.
- Integrate our due diligence in our new supplier selection and management processes.
- Continuously conduct due diligence of the supply chain regarding the use Conflict Minerals and extended minerals.
- In case of risks together with our customers and/or suppliers we will mitigate the risks towards a sustainable supply chain.
- Report on a yearly basis the results of the due diligence according the standard "Conflict Minerals Reporting template" (CMRT) and "Extended Minerals Reporting template" (EMRT) provided by the responsible minerals initiative.
- Improve the coverage on our supply chain in this due diligence.

Our due diligence is an ongoing process in which suppliers are contacted regarding their information concerning the origin of the so-called Conflict and Extended Minerals. In this process we make use of international databases, such as the smelters list from the responsible minerals initiative, and third parties to cover our supplier base. In case of identified risks we further investigate if its applicable for the actual customer product provided. If such is the case, we will work together with our suppliers and customers to reduce the risks and update our due diligence accordingly following the standard templates.

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