

California Supply Chain Act Disclosure

Oerlikon Metco (US) Inc. (OMUS) is dedicated to conducting business in a lawful and ethical manner, as well as complying with all applicable laws. As a part of this, we expect our suppliers to comply with our Supplier Code of Conduct and the EICC Code of Conduct. Our Supplier Code of Conduct and the EICC Code of Conduct establish standards to ensure that working conditions are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically. In addition to our Supplier Code of Conduct and the EICC, OMUS requires that any vendor or contractor providing goods or services or otherwise performing work pursuant to a contract or purchase order issued by the company comply with all applicable laws, statutes, rules, regulations and orders in effect in the countries and jurisdictions in which they do business.

With specific regard to the California Transparency in Supply Chains Act, OMUS provides the following information:

1. Verification: OMUS also has established a specific Conflict Mineral due diligence process in accordance with the Organization for Economic Cooperation and Development (OECD) Guidelines. Considering our position in the supply chain we support an industry initiative, the Responsible Minerals Initiative (RMI), that uses an independent third-party audit to identify smelters that have systems in place to assure sourcing of only conflict-free materials. We are committed to maintaining the highest standards of corporate responsibility; and compliance with regulations related to conflict minerals is a key aspect of our commitment.

To address this, we have implemented a robust system that involves working closely with our suppliers. On an annual basis, we request our suppliers to provide a Conflict Mineral Report as part of our due diligence process. This report outlines crucial information about the presence and origin of conflict minerals, specifically tin, tantalum, tungsten, and gold (3TG), in the materials they supply to us.

OMUS also conducts periodic audits on critical suppliers. OMUSs Policies are publicly available in our Policies section of our website <u>Policies on Sustainable Operations | Oerlikon</u> and <u>Human Rights |</u> Oerlikon Metco.

2. Audits: Verification is done through onsite supplier audits, especifically for compliance with Supplier Code of Conduct which includes company standards on trafficking and slavery in supply chains.



- 3. Certification: To ensure our contractors and suppliers respect and enforce our company standards, OMUS includes a clause in our general terms and conditions of purchase that requires all suppliers to certify they are in full compliance with all applicable laws, statutes, rules, regulations and orders in the country or countries in which they are doing business. Our Supplier Requirements Manual also requires that all products used in the company's manufacturing process come from suppliers we expect to comply with the Oerlikon Supplier Code of Conduct and the EICC Code of Conduct, which specifically prohibits any kind of forced labor, slavery, and human trafficking.
- 4. Internal Accountability: As a part of the Oerlikon Group, OMUS does currently have internal corporate policies specific to slavery and human trafficking, namely the Oerlikon Non-Discrimination and Anti-Harassment Policy, Policy Against Human Trafficking and Slavery and Policy Against the Use of Child Labour. Oerlikon also offers a whistleblower hotline where suspected or actual violations of these policies or applicable law can be reported.
- 5. Training: Oerlikon's annual Code of Conduct training covers human rights topics, including child and forced labor on a regular basis.

For questions and further information, please contact:
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