



TK Elevator

Conflict Minerals Sourcing Commitment

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1. Purpose

TK Elevator (TKE) is committed to conducting business with integrity and in a manner that respects internationally recognized human rights. We recognize that the extraction, transport, processing and trade of certain minerals may be associated with armed conflict, human rights abuses, child labour, corruption, environmental harm and other adverse impacts.

TKE seeks to ensure that its business activities do not directly or indirectly impact workers, local communities or the environment through mineral sourcing and related supply chain activities. This Policy sets out TKE's commitments and approach to responsible mineral sourcing and due diligence, complimenting TKE's Code of Conduct, Responsible Sourcing Commitment, and related procurement processes.

2. Scope

This Policy applies to TK Elevator, its subsidiaries, and joint ventures where TK Elevator is the majority shareholder worldwide.

While certain regulatory requirements currently focus on tin, tantalum, tungsten and gold (3TG), TKE's approach is based on the broader principles of responsible mineral sourcing as defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. TKE may apply this approach to other minerals and raw materials where relevant risks are identified.

3. Our Commitment

TKE is committed to responsible sourcing practices that support respect for human rights, ethical business conduct and sustainable development.

We seek to avoid contributing, directly or indirectly, to adverse impacts, but not limited to:

- Armed conflict or the financing of armed groups;
- Serious human rights violations and abuses;
- Forced labor, child labor or other forms of exploitation;
- Corruption, bribery and money laundering; and
- Significant adverse environmental impacts associated with mineral extraction, transport, processing or trade.



TKE promotes transparency and traceability within mineral supply chains and supports responsible sourcing practices that contribute to long-term economic and social development.

TKE's conflict minerals due diligence program is aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

4. Risk-Based Due Diligence

TKE maintains a conflict minerals due diligence program based on the OECD Five-Step Framework for Risk-Based Due Diligence. Our approach is risk-based and proportionate to our position within the supply chain, the products we procure and the risks identified.

As part of this approach, TKE will:

- Maintain governance structures and management systems that support responsible mineral sourcing;
- Identify and assess risks associated with minerals sourced from Conflict-Affected and High-Risk Areas;
- Promote supply chain transparency and obtain relevant sourcing information through established due diligence processes;
- Design and implement risk mitigation measures where actual or potential adverse impacts are identified;
- Monitor the effectiveness of mitigation activities and continuously improve due diligence processes; and
- Report on due diligence activities in accordance with applicable legal, regulatory and business requirements, whenever required

TKE applies a continuous improvement approach to responsible mineral sourcing and regularly reviews the effectiveness of its due diligence processes.

5. Industry Collaboration and Stakeholder Engagement

TKE recognizes that responsible mineral sourcing challenges are best addressed through collaboration across complex global supply chains.

Accordingly, TKE may participate in industry initiatives, engage with customers, suppliers, industry associations and other relevant stakeholders, and utilize recognized industry reporting frameworks, assessment tools and due diligence programs to enhance transparency, consistency and effectiveness in responsible sourcing practices.



6. Transparency and Reporting

TKE is committed to transparency regarding its conflict minerals due diligence activities.

Where required by law, customer commitments or reporting obligations, TKE will disclose relevant information regarding its responsible mineral sourcing program and due diligence practices. Such disclosures may be incorporated into sustainability, compliance or other corporate reporting processes, consistent with the OECD framework.

7. Stakeholder Concerns and Reporting

TKE supports the reporting of concerns related to potential adverse impacts in mineral supply chains.

Concerns may be raised through established ethics line: <https://www.tkelevator.com/global-en/about-us/compliance/submitting-a-report/>

Incoming reports are carefully reviewed and processed by the TK Elevator Investigations Team. You can find the detailed rules of procedure for our grievance mechanism / complaints procedure here: <https://www.tkelevator.com/global-en/tk-elevator-ethics-line.html>

This commitment supports early identification of risks and continuous improvement of TKE's due diligence program.

8. Regulatory Compliance and Governance

TKE is committed to complying with applicable legal and regulatory requirements relating to conflict minerals and responsible mineral sourcing in the jurisdictions in which it operates.

TKE maintains governance structures that assign responsibility for the oversight and implementation of conflict minerals due diligence.

Global Procurement, Sustainability and Compliance functions collaborate to establish controls, monitor risks, support due diligence activities and drive continuous improvement of responsible sourcing processes across the organization.

This Policy will be reviewed periodically and updated as necessary to reflect changes in legal requirements, stakeholder expectations and international best practices.