

CONFLICT MINERALS POLICY

Context Definition

TELEMA S.p.A. is committed to ensuring that all its activities adhere to ethical and sustainability standards, in line with the principles established in its Code of Ethics. This commitment extends to responsible sourcing practices, with the goal of respecting human rights and promoting an ethical and transparent supply chain.

Although TELEMA S.p.A. does not engage in extraction activities nor directly trade or purchase minerals, it recognizes the risk of exposure to the issue of conflict minerals through its supply chain. Some of these minerals may be present in components made from raw copper bars that are subjected to tin plating. This tinning process is applied across all product families related to load resistors, traction-related products, and, to a lesser extent, products related to grounding systems.

The raw copper, subsequently tinned, is processed by the following qualified supplier:

- BVR S.r.l. – VAT No.: 05571150969 – CCIAA/REA: MB 1864979, Via Daniele Manin, 350/10-11, Sesto San Giovanni 20090 (MI), Italy

The term “conflict minerals” refers to minerals and metals that may originate from or be linked to conflict-affected or high-risk areas (CAHRAs), as defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. The extraction and/or processing of these minerals in such regions may lead to negative social or environmental impacts, where revenues from these activities may be used, directly or indirectly, to finance or support armed groups involved in civil wars, resulting in violations of international law and human rights abuses such as torture, cruelty, inhumane and degrading treatment, forced or compulsory labor, and child labor.

In July 2010, the United States passed Resolution HR4173, Section 1502(b) of the Dodd-Frank Financial Reform Act, which became federal law requiring all publicly listed

companies in the U.S., along with their suppliers, to disclose information regarding the origin of conflict minerals (tin, tantalum, tungsten, and gold—commonly referred to as “3TG”) used in their supply chains. Following this regulation, the European Union adopted Regulation (EU) 2017/821, which sets similar requirements for importers of these minerals into the European market.

Although TELEMA S.p.A. is not legally required to report on conflict minerals, we believe it is important to promote responsible sourcing practices within our industry.

Our Conflict Minerals Policy is founded on this belief.

As of today, a single qualified supplier is responsible for the tinning process of the components mentioned in this document. This supplier is annually required to update the Conflict Minerals Reporting Template to comply with the sourcing policy described below.

Socially Responsible Sourcing

With this Policy, TELEMA S.p.A. declares its commitment to implementing a socially responsible sourcing policy aimed at promoting respect for human rights and avoiding any contribution to conflict through its indirect purchasing decisions and practices related to minerals across the entire supply chain.

In particular, TELEMA S.p.A. commits to:

- Require our suppliers not to use materials containing minerals sourced from conflict zones;
- Request formal declarations from its suppliers regarding the origin of materials and their compliance with applicable laws and regulations.

In this context, TELEMA S.p.A. undertakes to implement a process whereby suppliers declare whether the materials provided contain conflict minerals, using the Conflict Minerals Reporting Template (CMRT).

TELEMA

handling the current

Quarto (Piacenza), 20/03/2025

TELEMA S.p.A.

Direzione

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