



Instruction

# Conflict Mineral Policy



## Document Information

<b>Policy Holder (name and title)</b>	Sandra Klackenborn, Head of Sustainability
<b>Governing and Related documents:</b>	Dustin Supplier Code of Conduct

## Distribution, Confirmation and Implementation

This policy shall be distributed to the following groups of persons and shall be confirmed in accordance with the table below.

Confirmation required for this Policy	Read	Implemented
Board of Directors	X	
Leadership Team	X	
VP Private Label & Lifecycle Management Services	X	X
Director Procurement & Vendor Management	X	X

By confirming that the policy document has been **READ**, the recipient acknowledges having read and understood the contents of the policy.

By confirming that the policy document has been **IMPLEMENTED**, the recipient:

- has informed all pertinent persons within his/her respective unit of the content of this policy document; and
- has established a process to ensure that the principles and the minimum requirements of the policy will be followed within his/her respective unit.

## Versions

This policy has been updated since implementation and the most important changes are listed below.

Version	Major changes since last version
2019:1	General Review
2020:1	General Review
2021:1	General Review
2022:1	General Review

2023:1	General Review
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# Conflict Mineral Policy

## 1. Introduction

In order to ensure responsible sourcing, we have established Dustin Supplier Code of Conduct. We expect our suppliers to contractually commit to the code and that they enforce the relevant requirements in the Code, or similar, in their own operations and throughout their supply chains.

As stated in Dustin's Human Rights Policy, we recognize our responsibility to respect and protect human rights in all our business operations. This also concerns human rights violations and the role that armed conflicts play in causing extreme violence across the Democratic Republic of Congo and adjoining countries (the "DRC Region"). Illegal extraction and trading of the DRC Region's natural resources have been exploited to directly or indirectly fund armed conflict, and serious human rights abuses are linked to this conflict and to the mines of these minerals. Conflict Minerals is defined as tin, tungsten, tantalum, gold (the "3TGs") and their compounds sourced from mines that support or fund the conflict in the DRC Region.

Dustin is aware of the difficult situation that purchased products may contain minerals originating from the DRC Region and has therefore made this commitment related to Conflict Minerals. However, we do not encourage implementing a de facto embargo on the DRC Region in the sourcing of materials, but supporting responsible mining and trade in the region.

Dustin's Conflict Mineral Policy applies to all employees and in-house consultants and board members of Dustin Group, in all markets and at all times. In addition, Dustin Group expects its suppliers to adhere to the principles of this policy by developing own policies towards the use of conflict minerals and conduct due diligence for items supplied to Dustin Group. We incorporate the principles of this policy into our Supplier Requirements set forth in Dustin Supplier Code of Conduct, which is contractually binding.

## 2. Our Commitment

Dustin is committed to working towards avoiding Conflict Minerals in our products. In support of this commitment, Dustin will:

- 1) request our suppliers to work towards ensuring that any Conflict Minerals in the products supplied to Dustin originate from conflict free sources.
- 2) expect our suppliers to in a timely manner provide us with information that confirms that the 3TGs contained in any products supplied to Dustin originate from conflict free sources.
- 3) exercise due diligence with relevant suppliers to investigate the source of the minerals. The due diligence shall be performed in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- 4) ensure the products under our own brand source from "conflict-free" validated smelters to the extent sustainable and possible. For conflict-free validated smelters we rely on independent third party audit programs, such as the Conflict Free Smelter Program (CFSP), which audit smelters and refiners.
- 5) commit to transparency in the implementation of this policy by making relevant reports on our progress for products under own brand, available to relevant stakeholders as per request.

### 3. Guidance, Compliance and Reporting

The President & CEO has ownership of this policy document and performs annual content and compliance reviews.

Enforcement and compliance follow-up is part of every manager's responsibility. All employees are responsible for familiarizing themselves with the content and for acting in accordance therewith, and are encouraged to voice concerns with their immediate manager and to highlight examples of good practice. All operations covered by the policy document will be regularly reviewed.

If you have any questions, or any concern on known or suspected non-conformances regarding this policy, please send an email to [sustainability@dustin.se](mailto:sustainability@dustin.se) or mail Head of Sustainability.

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### 4. Updates and Reviews

This policy shall be reviewed and updated biannually or as needed based on the recommendations of Head of Sustainability.