



Statement of Principles

on

Conflict Minerals



Preamble

Berlin.Industrial.Group. (B.I.G.) is a dynamic alliance of highly specialized technology companies and startups. We serve global industrial markets with world-class products and continuously adapt to the rapidly changing needs of our customers by providing tailor-made solutions. “We” represents a diverse and synergistic mix of inventors and strategists, creatives, tech enthusiasts, passionate designers, and engineers.

At our Berlin location, more than 340 dedicated employees work with great commitment toward our shared goal: shaping the industry of tomorrow—today. In line with our corporate purpose, “Acting freely, industrially, and sustainably,” we strive to meet the expectations of our stakeholders in a way that respects the environment and human rights.

This Conflict Minerals Statement supplements the applicable B.I.G. Code of Conduct. It defines our principles and procedures for responsibly handling minerals that may originate from conflict-affected and high-risk areas.

Purpose

We explicitly acknowledge that the extraction and trade of certain minerals—particularly tantalum, tin, tungsten and gold (3TG)—can be associated with severe human rights abuses, armed conflict, and exploitation in some regions of the world. Our objective is to ensure that our products do not contribute to the financing of such conditions.

This statement is binding for all companies within B.I.G., all employees throughout the value chain, and all suppliers and partner companies. It outlines how we assess risks, make decisions, and manage our supply chains responsibly

International Standards and Legal Frameworks

Our activities follow internationally recognized standards for responsible sourcing. We commit to fully implementing the OECD Due Diligence Guidance, complying with EU Regulation 2017/821, and—where required by customers or industry standards—considering the provisions of Section 1502 of the U.S. Dodd-Frank Act.

We also align with the standards of the Responsible Minerals Initiative (RMI), particularly the Responsible Minerals Assurance Process (RMAP). This statement is reviewed regularly and made publicly accessible to ensure transparency about our progress.

Responsibility and Governance

We have established a structured responsibility model for fulfilling our due diligence obligations related to conflict minerals. Overall responsibility lies with the Executive Management, while operational coordination is handled by Strategic Procurement.

Strategic Procurement works closely with Supply Chain Management, Quality Management, and Compliance. Roles are clearly defined to ensure that risk assessments, documentation requirements, and control mechanisms are applied consistently, transparently, and effectively.

Management Systems and Documentation

B.I.G. operates a comprehensive supplier management system that centrally records all relevant documents, risk analyses, smelter information, and supplier assessments. This system ensures continuous transparency across our supply chains and supports compliance with regulatory requirements.

All CMRT and EMRT data, relevant audit reports, and corrective action plans are centrally stored and regularly reviewed. The system also ensures consistency in our internal and external communication, with transparent and traceable documentation at all times.

Risk Identification and Assessment

We conduct annual and event-driven risk analyses to identify potential risks within our supply chain at an early stage. This includes supplier self-assessments, up-to-date information from RMI databases, and data from our whistleblowing system.

Suppliers are evaluated based on a defined set of criteria and categorized according to risk level. This assessment allows us to systematically prioritize risks and derive targeted measures.

Risk Management and Mitigation Measures

When risks are identified or when a supplier uses non-conformant smelters, we develop a structured corrective action plan together with the supplier. This plan includes clear requirements, responsibilities, and binding deadlines.

If a supplier is unwilling or unable to reduce risks or provide proof of conformant smelters, we reserve the right to suspend or terminate the business relationship. This ensures that neither our products nor our activities contribute to human rights abuses or conflicts.

Supplier Requirements

We expect all our suppliers to actively support responsible sourcing practices. They are required to provide complete and accurate CMRT or EMRT data annually, to work exclusively with smelters validated as RMAP-conformant, and to actively assess risks within their own supply chains.

Suppliers must also promptly report relevant changes in their supply chains and participate in audits and assessments. Compliance with these requirements is considered a prerequisite for long-term cooperation.

Requirements for Smelters and Refiners

We only accept smelters and refiners that are listed by the Responsible Minerals Initiative as “Conformant” or “Active.” If a supplier uses smelters that do not meet these criteria, we expect immediate action to transition to compliant sources.

Our procurement decisions consistently follow these requirements to ensure that our supply chain remains free from conflict support.

Continuous Improvement

We view responsible sourcing as a dynamic process. Therefore, we regularly review and further develop our policies, procedures, and processes. Insights from internal audits, supplier discussions, and industry developments contribute to ongoing improvement.

We also participate in initiatives and working groups that promote exchange and support the development of common industry standards. Where appropriate, we expand our due diligence activities beyond 3TG—for example to cobalt, mica, or other critical raw materials.

Through these efforts, we contribute to maintaining a responsible and ethical supply chain and reinforce our commitment to sustainable and socially responsible business conduct.

Final Provisions

This statement enters into force upon publication and applies to all employees and business partners of B.I.G. It forms the binding framework for our actions in handling conflict minerals and underscores our commitment to human rights due diligence, transparency, and responsible supply chains.