

Bulten Conflict and Extended Minerals Policy

Bulten is committed to responsible sourcing and ethical business practices throughout its supply chain.

This commitment includes sourcing minerals responsibly to ensure that our products do not directly or indirectly finance or benefit armed conflict, contribute to human rights abuses, or support exploitative labor practices.

We support the objectives of the Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502, the EU Conflict Minerals Regulation (Regulation 2017/821) and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We expect all our suppliers to adopt responsible mineral sourcing practices and to perform due diligence throughout their supply chains.

This policy applies to all products manufactured by or for Bulten as well as to all suppliers, subcontractors, and business partners within our global supply chain.

Bulten will:

- Implement internal procedures aligned with the OECD Due Diligence Guidance and EICC-GeSI Conflict-Free Sourcing Initiative.
- Work to trace the minerals back to their source by surveying suppliers using the Conflict Minerals Reporting template (CMRT) and the Extended Mineral Reporting template (EMRT).
- Require suppliers to submit complete and accurate CMRTs and EMRTs regularly.

Supplier Expectations

As outlined in Bulten's Code of Conduct for Suppliers and Business Partners, all suppliers and business partners (collectively referred to as "Bulten partners") must implement appropriate and reliable measures - aligned with relevant regulations and the OECD guideline - to ensure, to the best of their knowledge and belief, that any use of conflict minerals (3TG: tantalum, tin, tungsten, and gold) and extended minerals (such as cobalt, mica, and others potentially associated with human rights abuses) in their products does not directly or indirectly contribute to armed conflict, child labor, or other human rights violations.

The Bulten partner shall:

- * Implement and maintain a due diligence process to determine the origin and chain of custody of the minerals.
- * Take immediate and appropriate action to mitigate any identified risks if minerals are found to be sourced from conflict-affected or high-risk areas in violation of this policy.
- * Provide accurate and timely information to Bulten regarding smelters and refiners in their supply chain.
- * Require their own suppliers to adhere to similar standards for responsible mineral sourcing.

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Axel Berntsson

President and CEO Bulten AB, (publ.)