



Conflict Minerals Policy

December 12, 2025

SmarAct GmbH is committed to responsible procurement practices and the promotion of human rights and ethical conduct within its global supply chain. We strive to ensure that the minerals we use in our products do not directly or indirectly finance or benefit armed groups, human rights abuses, or illegal activities in conflict-affected and high-risk areas (CAHRAs), particularly the Democratic Republic of the Congo (DRC) and surrounding countries. This policy covers the sourcing of “conflict minerals”, specifically tin (Sn), tantalum (Ta), tungsten (W), and gold (Au), collectively referred to as 3TG. The scope of this policy extends to all employees, suppliers, contractors, and business partners of SmarAct GmbH.

Commitment to Conflict-Free Sourcing

Our policy is to source 3TG minerals from conflict-free sources only. We exercise due diligence to ensure that products and components supplied to us containing 3TG minerals are conflict-free. We do not purchase raw metal ore directly from mine. Consequently, we work collaboratively with our suppliers to ensure a conflict-free supply chain.

Due Diligence Framework

At SmarAct GmbH, our management systems are designed to identify, assess and mitigate risks in our supply chain.

Key elements of our due diligence process include:

Supplier Engagement: We require all direct suppliers to adopt similar conflict minerals policies and to pass these requirements down to their own suppliers.

Information Collection: We require suppliers to provide detailed source information, including the country of origin and the smelters/refiners used, utilizing the industry-standard Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT).

Risk Assessment and Mitigation: We review the information provided by our suppliers to identify potential risks. We expect suppliers to source from smelters and refiners that are validated as conflict-free through an independent third-party audit.

Corrective Action: If we discover that any 3TG minerals used in our products are considered “non-conflict free” or linked to high-risk activities, we will take immediate appropriate actions to address such risks and facilitate transition to an alternative, compliant source.

Record Keeping and Reporting: At SmarAct GmbH, we maintain records of our due diligence process and make available reports on our progress to ensure transparency.

Supplier Expectations

SmarAct GmbH expects its suppliers to:

- Have in place policies and due diligence measures that align with the OECD Due Diligence Guidance.
- Provide accurate and complete CMRTs upon request and cooperate with any due diligence efforts.
- Immediately report any “red flag” locations of mineral origin or transit and exclude conflicting smelters/refiners from the supply chain.
- We reserve the right to discontinue business with suppliers who fail to comply with this policy.

Grievance Mechanism Transparency

We maintain a transparent approach to our policy implementation. Any employee, supplier, or external party can report concerns or violations related to our conflict minerals sourcing by contacting our dedicated compliance team/compliance manager. You can also report this via our anonymous whistleblower portal: [Whistleblower Portal - SmarAct](#)

Sincerely,



Michael Weigel-Jech
CEO SmarAct GmbH

This policy is subject to periodic review and revision to ensure ongoing alignment with regulatory requirements and best industry practices.