

DEUTZ

Conflict Minerals Policy

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DEUTZ meets its social, corporate, and environmental responsibilities by pursuing its Taking Responsibility sustainability strategy. On this basis, DEUTZ promotes the responsible procurement of minerals in its supply chain across the Group.

The procurement of minerals is a complex process, as these goods are not always freely available everywhere in the world and are essential to many sectors of industry, including for DEUTZ. The minerals tin, tantalum, tungsten, and gold, and their ores, are mined extensively in the Democratic Republic of the Congo, where they are often extracted illegally and unethically in what is known as artisanal and small-scale mining (ASM). There have been armed conflicts and human rights violations¹ in the Democratic Republic of the Congo and adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia) for decades, which is why the region is considered a conflict-affected and high-risk area and the aforementioned minerals are referred to as conflict minerals. Two of the very important pieces of legislation worldwide that require companies to meet due diligence obligations and requirements are: the Dodd-Frank Wall Street Reform and Consumer Protection Act², enacted in the United States of America in 2010, and the European Union's Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas³.

The Dodd-Frank Act was originally passed in response to the financial crisis of 2007-2008 with the aim of increasing transparency in the financial sector⁴. Sections 1502 to 1504 deal with conflict minerals from the Democratic Republic of the Congo and adjoining countries, define reporting and disclosure requirements, and specify that companies involved in the commercial development of oil, natural gas, or minerals must disclose payments to governments. The Dodd-Frank Act covers the four conflict minerals tin, tantalum, tungsten, and gold, as well as their ores and derivatives, and is only binding for companies listed on the US stock exchange.

Regulation (EU) 2017/821 of 2017 is the European Union's counterpart to the Dodd-Frank Act. It lays down supply chain due diligence obligations for companies that want to import minerals and metals for release for free circulation within the customs territory of the Union⁵ (Article 2 (I)). Commonly known as the EU Conflict Minerals Regulation, it codifies transparency requirements in law for the first time across the EU and aims to curb the financing of violence and human rights violations in conflict-affected and high-risk areas⁶. It defines management system obligations (Article 4), risk management obligations (Article 5), third-party audit obligations (Article 6), and disclosure obligations (Article 7) for Union importers. Regulation (EU) 2017/821 also covers the conflict minerals tin, tantalum, tungsten, and gold, as well as their ores and metals mentioned in Annex I.

DEUTZ is not a Union importer within the meaning of Regulation (EU) 2017/821 and thus not directly affected by this EU regulation. Furthermore, DEUTZ is not listed on the US stock exchange and thus not directly affected by the Dodd-Frank Act. Nonetheless, DEUTZ and its business partners support these laws and the responsibilities that they impose. DEUTZ follows the OECD Guidelines for Multinational Enterprises and the rules of the U.S. Securities and Exchange Commission aimed at preventing the financing of armed groups in the Democratic

¹ German Federal Agency for Civic Education, 'Kriege und Konflikte – Demokratische Republik Kongo' (Wars and conflicts – Democratic Republic of the Congo), <https://www.bpb.de/themen/kriege-konflikte/dossier-kriege-konflikte/54628/demokratische-republik-kongo/>.

² Referred to as Dodd-Frank Act from here on.

³ Referred to as Regulation (EU) 2017/821 from here on.

⁴ Rüttinger, Lukas and Laura Griestop (2015): Dodd-Frank Act. UmSoRes profile. Berlin: adelphi.

⁵ Referred to as Union importers from here on.

⁶ Munich Chamber of Commerce and Industry, information sheet: Die EU-Konfliktmineralien-Verordnung (The EU Conflict Minerals Regulation), www.ihk-muenchen.de.

Republic of the Congo and adjoining countries through conflict minerals. The Group as a whole also holds its suppliers along the supply chain to account in this regard.

DEUTZ suppliers undertake to provide the Group with adequate information promptly and without exception upon request by means of the 'Conflict Minerals Reporting Template' (CMRT, as amended). They also undertake to ensure that the goods and materials used in the manufacture of products for DEUTZ are not acquired or extracted by illegal or unethical means, and that the minerals used do not originate in conflict-affected and high-risk areas. They work exclusively with smelters and refiners that conform with the standards of the Responsible Minerals Assurance Process (RMAP).

DEUTZ suppliers ensure that their upstream suppliers meet their obligations and the requirements of DEUTZ. DEUTZ may request full supply chain disclosure from its suppliers where it deems this to be necessary, and reserves the right to conduct assessments and audits. By applying these rules and maintaining an ongoing dialogue with its suppliers, DEUTZ ensures that the requirements of the Dodd-Frank Act and EU regulation (EU) 2017/821 are met along the Group's supply chain.