

Keenfinity Group Policy for Conflict Raw Materials

Keenfinity Group joined the United Nations Global Compact Initiative in 2004 while operating as Bosch Building Technologies within the Bosch Group. This affiliation reflects our enduring commitment to Corporate Social Responsibility (CSR), which continues to guide our actions even after becoming independent from the Bosch Group. For Keenfinity, CSR includes, especially, the protection of human rights and the environment, compliance with health standards and labor laws, as well as ethical business conduct. In this context, we promote the procurement of materials with consideration of their impact on environmental and social factors.

To develop effective countermeasures against social issues in the supply chain, we believe that collaboration across industries using conflict minerals is essential. Reflecting this belief, Keenfinity Group, then operating as Bosch Building Technologies within the Bosch Group, joined the Responsible Minerals Initiative (RMI) in 2014. This step supported an industry-wide approach to mineral reporting and supplier education, underscoring our long-standing commitment to responsible sourcing.

We require our suppliers to respect and comply with all applicable legal requirements related to the sourcing of raw materials from conflict-affected and high-risk areas, commonly referred to as 'conflict minerals', as defined in relevant international regulations.. The classification "conflict minerals" includes, independently of their geographical origin, the minerals cassiterite, coltan, wolframite, and their derivatives tin, tantalum, tungsten, as well as gold (together known as 3TG). These raw materials are often mined with the risk of human rights abuses, as well as the risk that armed conflicts will be financed by the sale of these minerals.

Keenfinity does not directly source any of these minerals from mines in the high-risk territories or elsewhere, in fact the supply chain of these materials consists of many tiers. Before any product reaches our factories, the supply chain includes many stages including mines, smelters, traders, exporters, refiners, alloy producers and component manufacturers. Thus, Keenfinity supports the approach of validating smelters and refiners for 3TG, as they play a key role in the supply chain from the mining site to the final product. Within this approach, Keenfinity respects the OECD's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas." Considering these OECD principles, we ask our respective suppliers to report the origin, and the certification status of the smelters and refiners involved. We regularly report the outcome of our data collection and analysis of the certification status.

Relevant suppliers and sub-suppliers are asked to collaborate with smelters and refiners that are conformant with the Responsible Minerals Assurance Process (RMAP) by RMI. The

RMAP identifies smelters and refiners that can verify that their raw materials do not originate from suppliers contributing to conflicts in the high-risk areas. We also highly encourage our suppliers to participate in the RMI or similar relevant industry initiatives with the intention to improve the conditions in the extractive industry.

Our suppliers shall confirm compliance with the UN Global Compact Initiative and with the principles of our Keenfinity "Code of Conduct for Business Partners" as well with their suppliers, or Keenfinity sub-suppliers. If necessary, Keenfinity requests full transparency of critical supply chains and reserves the right to conduct assessments or audits of suppliers at risk.

In line with the OECD Due Diligence Guidance and applicable legislation currently in effect, such as the Conflicts Mineral Regulation and the German Supply Chain Act, as well as any future amendments or newly enacted regulations, we conduct regular risk assessments on raw materials with potential environmental and social impacts. Identified risks are addressed through targeted mitigation measures, and we ensure transparency through appropriate reporting and stakeholder engagement.

THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

Human Rights

- ▶ Businesses should support and respect the protection of internationally proclaimed human rights; and
- ▶ Make sure that they are not complicit in human rights abuses.

Labour

- ▶ Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- ▶ The elimination of all forms of forced and compulsory labor;
- ▶ The effective abolition of child labor; and
- ▶ The elimination of discrimination in respect of employment and occupation.

Environment

- ▶ Businesses should support a precautionary approach to environmental challenges;
- ▶ Undertake initiatives to promote greater environmental responsibility; and
- ▶ Encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- ▶ Businesses should work against corruption in all its forms, including extortion and bribery.