



Heinrichs Messtechnik GmbH

Conflict Minerals Due Diligence Report for

2025

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Document links:

Report 2025: https://heinrichs.eu/wp-content/uploads/cert/3TG_Report_2025_en.pdf

Policy: https://heinrichs.eu/wp-content/uploads/cert/HMT_Policy_CMAT_en.pdf

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1. Introduction

Heinrichs Messtechnik GmbH (Heinrichs), a member of the Kobold Holding Group, is an internationally active, medium-sized manufacturer of precision mechanical and electromechanical flow instrumentation based in Cologne, Germany. Our products measure liquids or gases in a wide variety of industrial processes, including those containing highly corrosive materials. This is made possible by the use of tantalum, a so-called "conflict mineral," as a wetted material. The chemical resistance of tantalum ensures long-term performance in demanding industrial applications with high requirements.

In alignment with our policy, it is our responsibility to avoid sourcing conflict minerals from Conflict-Affected and High-Risk Areas (CAHRAs).

With this report, Heinrichs provides an overview of its corporate strategy for fulfilling supply chain due diligence and its procedures for responsible sourcing of minerals from the so-called group of conflict minerals, particularly tantalum. It has been prepared in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas (Third Edition of November 12, 2019 – "OECD Guidance") and Article 7(3) of Regulation (EU) 2017/821 of the European Parliament and of the Council of May 17, 2017 ("Conflict Minerals Regulation").

This report is limited to Heinrichs's products that require the conflict mineral Tantalum for their functionality or production.

2. Corporate Strategy for risk minimisation

As an importer of tantalum into the European Union, Heinrichs, as a downstream company, is subject to the criteria and requirements of the Conflict Minerals Regulation. The goal of our strategy, as a Union importer of tantalum, is to comply with the "supply chain due diligence" requirements. The three other 3TG minerals, tin, tungsten, and gold, are not primary components of our products; nevertheless, appropriate verification of the country of origin of these 3TG minerals is carried out in the course of our due diligence efforts.

To fulfil its due diligence obligations, Heinrichs has integrated the requirements of the OECD Guidelines into its QM system, which is continuously updated to meet new requirements and identified risks. Our QM system is ISO 9001:2015 accredited by an accredited provider, thus ensuring a proven, functioning traceability system.

Declaration of Principles on Human Rights

We are committed to neither violating human rights ourselves nor contributing to human rights violations, directly or indirectly. In line with this principle, we are committed to avoiding the sourcing of minerals from conflict-affected areas, and we clearly communicate this stance to our identified potential conflict material suppliers.

Our Supplier Code of Conduct for business partners reflects our stance regarding human rights, ethics, equality, and the sourcing of conflict-free materials. Acceptance of this code is a prerequisite for supplying 3TG conflict material.

Heinrichs Compliance Team

To implement and achieve our strategies and objectives, a cross-departmental Conflict Minerals Team was formed, sensitised, and trained accordingly. This team is responsible for gathering and evaluating information on 3TGs from the supply chain, as well as identifying potential risks and initiating additional due diligence steps with suppliers and stakeholders to mitigate any potential impact of these risks.

The team reports the results of these due diligence measures directly to the management.

The Conflict Minerals Team has identified suppliers who;

- supply Heinrichs directly with 3TG metals,
- supply Heinrichs potentially unconsciously with 3TG metals, or
- are potentially supplied with 3TG material by their upstream suppliers

We periodically reach out to these suppliers, requesting that they upload a valid Conflict Minerals Reporting Template (CMRT) from the Responsible Minerals Initiative (RMI) to our third-party suppliers' portal. This template should include source information about the smelters or refineries. The submitted documents undergo due diligence based on established internal procedures to ensure compliance with Heinrichs' 3TG acceptance criteria.

The aim of this strategy is to comply with all requirements relevant to due diligence, and which correspond to the standards listed in Annex II of the OECD Guidelines on the Model Supply Chain Strategy.

Involvement of our Suppliers

To comply with our corporate strategy, we require our suppliers to:

- enhance their dialogue with Heinrichs to ensure adherence to the company's strategy, also supported by corresponding contractual requirements and other agreements, such as the written acknowledgment of our Supplier Code of Conduct..
- Participation in our due diligence process to identify potential risks associated with conflict and high-risk areas in order to address them systematically and sustainably.
- Constructive and transparent communication with our conflict material suppliers, especially tantalum suppliers.

For this purpose, a supply chain process has been established that closely follows the OECD guidelines. The process complies with the requirements of the EU Conflict Minerals Regulation, which requires 3TG importers and downstream companies to report the presence and origin of conflict minerals.

To automate the targeted procurement of the required information at regular intervals to ensure compliance with OECD requirements, Heinrichs has enlisted the support of a third-party provider.

Control System

Heinrichs requires all its suppliers to have functioning procedures in place to ensure that the minerals we source are conflict-free / responsibly sourced. This means that the minerals must not originate from regions known for widespread human rights violations and violations of the law. We expect suppliers to provide information on the origin of 3TG minerals, including sources from upstream suppliers.

Our Supplier Code of Conduct applies to all direct suppliers and sets out our expected behaviours based on industry standards and internationally recognized principles, such as the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance.

All direct suppliers are required to adhere to our Supplier Code of Conduct. If a supplier violates the Code, Heinrichs will evaluate the impact of this violation on the fulfilment of its own objectives and adjusts its relationship with the supplier accordingly. The Code of Conduct is reviewed

annually and amended as necessary to ensure it complies with our requirements and those of the OECD.

With its whistle-blower mechanism, Heinrichs has also established an early warning system that provides suppliers, customers, and/or intermediaries with the opportunity to alert us to discrepancies or potential non-conformities in our procurement activities.

For disclosure purposes, one of the following complaint channels may be used.
Kobold Group Whistleblower Center:

Internet: <https://koboldgroup.hinweisgeberexpertemeldeplattform.de>
E-Mail: info@hinweisgeberexperte.de
Telephone: +49 (0)89 21 52 74 33

We guarantee the anonymity of the reporting person via any of the above channels.

3. Identification and Minimization of Risks

The Conflict Minerals Team continuously identifies and evaluates internal risks and those within the supply chain. To implement its risk management measures, Heinrichs is currently fine-tuning its risk management strategy, which is integrated into the existing Quality Management (QM) system and will be continuously analysed and shall be updated in the future as the situation requires.

Risks in the Supply Chain

The risk assessment of our suppliers involves, among other aspects:

- Identifying Tier 1 conflict mineral suppliers and establishing a constructive and transparent dialogue about their own due diligence efforts.
- the obtaining of information about their suppliers using the RMI CMRT templates.
- evaluating supplier responses to determine the origin and supply chain of conflict minerals.
- contacting suppliers who have not provided any or incomplete responses.

Suppliers who do not provide the required or insufficient information will first be asked to correct the situation, with an offer of support. If there is no or an inadequate response, an escalation process will be initiated, and the possible consequences will be openly communicated with the supplier. If the escalation process does not lead to the desired result, and it is deemed the resulting risks cannot be contained, a temporary suspension or termination of business relationships will be considered.

The inclusion of new suppliers for the procurement of the conflict mineral tantalum is regulated by internal procedural instructions, which are subsequently subjected to an extensive review. Only after all legal requirements as well as Heinrich's own requirements have been met, shall the procurement by the new supplier be approved.

To identify potential risks early in the process, the Conflict Minerals Team monitors the procurement before the initial delivery, from the quotation to storage, carefully checking the quality of the goods as well as the completeness of the delivery documents.

Risk Assessment of Smelters or Refineries

Heinrichs does not maintain direct contact with smelters or refineries, but requests this information from its suppliers via the CMRT template. With the Conflict-Free Smelter Program ("CFS"), RMI has created a program through which smelters of conflict materials can receive a "conflict-free" certificate. In this program, an independent third-party institution audits the smelter, examining its business processes and the origin of the materials it acquires. The company must demonstrate that all processed materials are sourced from conflict-free origins.

The "CMRT Standard Smelter List" on the official RMI website serves as the basis for Heinrichs supplier acceptance. Smelters or refineries with a valid "conflict-free" certificate are also listed on the "RMI Active and Conformant Facilities List. If the smelter or refinery is not included in this list, it will be included in the risk assessment.

Risk Management Strategy

By the careful selection of its suppliers with proven conflict-free practices, building close business relationships, and regularly obtaining detailed information about the origin of tantalum and the entire supply chain, we aim to keep risks low from the outset.

We only work with suppliers who have implemented tantalum traceability systems throughout their entire supply chain, thereby raising awareness of the importance of conflict-free sourcing. The documents accompanying each delivery are carefully reviewed for compliance to quickly identify and respond to changes in the risk landscape.

Within the scope of an internal audit, the level of compliance with our set due diligence objectives is recorded and evaluated annually. This audit primarily focuses on internal processes and procedures and the information gained from them to demonstrate their effectiveness. The results of this audit are fed back into risk mitigation and are used to update our risk mitigation strategy.

The results of these audits, as well as any other findings or feedback from the supply chain, are assessed as part of our annual management review, which is reported directly to our management.

Transparency of our Upstream Data

Based on our internal assessments, we identified two companies that supply us with the conflict material tantalum. Both companies have provided us with detailed information about their procurement activities and the smelters or refineries with whom they work.

One company based in the EU is a long-standing partner that specializes in tantalum processing and meets all the requirements of Regulation (EU) 2017/821 of the European Parliament, to which it is also subject.

The second company, with whom we have worked closely for over five years, is situated in China. From this company we import our tantalum semi-finished products. This company specialises in the production of Tantalum Semi-finished product, and supplies numerous globally renowned companies. It sources its tantalum metals exclusively from Chinese smelters listed on the RMI "Active and Conformant Facilities List".

The smelters and refineries utilised by these two suppliers were reported in their CMRT's provided to us, and are listed in Appendix A.

Since it is common practice for a company to list all of its smelters in its CMRT, regardless of whether or not the materials supplied to us originate from all the reported smelters, we assume that the smelters listed in Appendix A is larger than the actual number of smelters that produced the Tantalum material for our products.

For the three other 3TG metals—gold, tin, and tungsten—for which Heinrichs is not required to report, we have identified nine additional suppliers. We are currently working on incorporating this information into our future reports once all available information has been sufficiently evaluated.

Appendix A

List of relevant Smelters and Refineries for the procurement of our Tantalum

Nr.	Smelter ID.	Smelter Name	Location	Status
1	CID002548	Materion Newton Inc.	USA	Compliant
2	CID001277	Ningxia Orient Tantalum Industry Co., Ltd.	CHINA	Compliant
3	CID001522	Yanling Jincheng Tantalum Co., Ltd.	CHINA	Compliant
4	CID000460	F&X Electro-Materials Ltd.	CHINA	Compliant
5	CID002842	Jiangxi Tuohong New Raw Material	CHINA	Compliant
6	CID000914	JiuJiang JinXin Nonferrous Metals Co., Ltd.	CHINA	Compliant