

CERATIZIT Group Public Due Diligence Report for FY2023/24 (March 1, 2023, February 29, 2024)

The CERATIZIT Group Public Due Diligence Report is structured in line with the Public Due Diligence Report Writing Guidance of the Responsible Minerals Assurance Process ([RMAP Due Diligence Report Guidance.pdf \(responsiblemineralsinitiative.org\)](https://www.responsiblemineralsinitiative.org/RMAP-Due-Diligence-Report-Guidance.pdf)) published by the Responsible Minerals Initiative (RMI) at www.responsiblemineralsinitiative.org.

1) Company information:

Company Name	CERATIZIT Group
Company location:	101, Route de Holzem LU-8232 Mamer, Luxembourg
3TG material processed:	Tungsten, Tantalum
Webpage:	CERATIZIT English
Time period covered	01.03.2023 – 29.02.2024

CERATIZIT Group is a high-technology engineering group specialized in cutting tools and hard material solutions part of the Plansee Group.

CERATIZIT Group is committed to ensuring that our raw materials are sourced responsibly for all our locations. Our Supplier Policy and Code of Conduct set forth our corporate commitments to ethical business practices and legal compliance and we only do business with suppliers that adhere to these commitments.

CERATIZIT Group only buys material sourced from suppliers or smelters that are included on the Responsible Minerals Initiative (RMI) Conformant Smelter List who have completed the Responsible Minerals Assurance Process (RMAP). (<http://www.responsiblemineralsinitiative.org>). If a company is not included in the Smelter List, we require deeper investigation and are supported by a third-party company to evaluate risks.

CERATIZIT Group, we strongly emphasize sustainability and the responsible treatment of the environment. This means transforming our industrial behaviour by responding to social, environmental, and economic challenges while we continue to meet and exceed the expectations and requirements of our customers and stakeholders. Reducing our carbon footprint, recycling of cemented carbide or the responsible purchase of raw materials are only some examples of our activities in the field of durability.

2) Assessment Summary

CERATIZIT Group has carried out an independent third party audit of its due diligence process and mechanisms according to the requirements of article 6 of the [REGULATION \(EU\) 2017/821](#). This audit has been carried out by Quality Austria, the name of the auditors will not be mentioned for confidentiality reasons.

CERATIZIT Group fully supports and encourages the implementation of article 9 of the [REGULATION \(EU\) 2017/821](#) referring to a list of „global responsible smelters and refiners“.

Chapter 5 of AUDIT REPORT REGULATION (EU) 2017/821(2023) „Audit conclusion regarding the special audit focus Regulation (EU) 2017/821

The audit criteria based on Article 6 and the determination of conformity of Articles 4, 5 and 7 do not reveal any non-conformities based on the samples taken, see 4.1 – 4.3 of this audit report.

The Strategic Raw Material Purchasing Analyst has already made the decision to limit the number of procurement sources to suppliers from the Ceratizit Group's immediate sphere of influence, primarily the Group company GTP in Towanda, USA, wherever possible.

Therefore, no further recommendations for improving supply chain due diligence practice were possible within the scope of the current audit.“

3) Company Supply Chain Policy

As set forth in our Supplier Policy, CERATIZIT Group and the Plansee Group are committed to responsibly sourcing all raw materials and require that all suppliers are committed to equally high standards.

The Plansee Group Supplier Policy is part of CERATIZIT's company management system. CERATIZIT is audited against ISO 9001, ISO 14001. Further details on CERATIZIT's quality management systems and company process controls can be found at: [CERATIZIT | Sustainability & Responsibility](#).

4) Company Management System

CERATIZIT has implemented processes and procedures to ensure that our sourcing does not support or benefit armed conflict groups or involve serious abuses of human rights. This scope includes but not limited to GTP Bruntal, GTP Luxembourg, and CERATIZIT importing facilities.

Our Strategic Raw Material Purchasing Analyst, VAN ALSENOY Aline (aline.vanalsenoy@ceratizit.com) is assigned with responsibility for ensuring that conflict minerals are sourced in a legitimate and ethical manner and according to our policies and procedures under supervision of the Director of Raw Material Sourcing & Planning.

CERATIZIT Group uses SAP for tracking and recording of all raw material supplies from purchase, logistics, analysis, and consumption.

CERATIZIT uses distinct part numbers for each raw material type which ensures that purchased raw material type per Purchase Order is clearly identifiable. The CERATIZIT receiving department is highly experienced in identifying raw material types and any discrepancies are reported to the Procurement Department. All incoming raw materials are sampled and analysed.

In case of concerns related to CERATIZIT's sourcing and sourcing practices, all employees at CERATIZIT Group, suppliers, customers, and other stakeholders are encouraged to submit additional questions or claims to Sustainability.Procurement@ceratizit.com.

5) Risk Identification

CERATIZIT only buys from suppliers capable to provide material from smelters or directly from smelters that are included on the Conformant Smelter List of the Responsible Minerals Initiative (RMI) that take part in the Responsible Minerals Assurance Process (RMAP) (<http://www.responsiblemineralsinitiative.org>). If a company is not included in the Smelter List, we require deeper investigation and are supported by a third-party company to evaluate risks.

In accordance with the [OECD Guidance Annex II](#), CERATIZIT strongly condemns all activities and will refuse any material, which we believe benefitted or supported armed rebels/terrorist groups through illegal finance or other activities or involved serious human rights violations associated with the extraction, handling, transport or trade of minerals, including:

- Serious abuses (i.e., torture, cruel, inhuman, and degrading treatment; forced for compulsory labour; worst forms of child labour; human rights violations and abuses such as widespread sexual violence; war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide).
- Direct or indirect support to non-state armed groups.
- Direct or indirect support to public or private security forces.
- Bribery and fraudulent misrepresentation of the origin of minerals.
- Money laundering.
- Non-payment of taxes, fees, and royalties to governments.

CERATIZIT has implemented a standard process for Supplier Selection and Qualification (Evaluating/Selecting Suppliers per ISO Standard). All suppliers of raw material are validated through 3 mandatory steps: evidence of a Conflict Mineral Reporting Template, Signature of a Quality Assurance Agreement, and quality verification of the material according to our specifications.

CERATIZIT has strict rules and regulations when it comes to bribery and fraudulent misrepresentation of the origin of minerals, money laundering and non-payment of taxes, fees, and royalties to governments.

During the period covered under this report no major risks were identified.

6) Concluding comments

In the period reported, CERATIZIT only sourced conflict minerals from companies on the Conformant Smelter List of the RMI.

Strategic Raw Material Purchasing Analyst,

A handwritten signature in black ink, appearing to read "Aline Van Alsenoy".

VAN ALSENOY Aline

Director of Global Raw Material
Sourcing & Planning

A handwritten signature in black ink, appearing to read "Eric Rowe".

ROWE Eric