

Document number: POL EMEA-11189	Document title: EMEA Conflict Minerals Policy				Document owner: Jessica Ström
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1 Introduction

The management philosophy of Yaskawa Europe GmbH (YASKAWA EMEA) is to contribute to the evolution of society and the welfare of humankind throughout its value chain. To build a solid relationship of trust within society, YASKAWA continually makes efforts to respect Human Rights and comply with related laws.

As of 2025, the situation in the eastern Democratic Republic of the Congo remains highly volatile, particularly in relation to conflict minerals such as tin, tantalum, tungsten and gold. This has led to many people being forced into life as refugees, which is a serious violation of Human Rights. In 2012, the United States of America implemented, within the Dodd-Frank Act, a new section (No.1502) which requires companies to evaluate their supply chains and disclose the origin of 3TG (Tin, Tantalum, Tungsten and Gold) minerals. It is also required to perform due diligence within the supply chain and report findings - if the minerals are sourced from conflict areas.

YASKAWA EMEA makes efforts to prevent the use of 3TG substances, that originates from the DR Congo or other conflict areas (as mentioned in the EU/2017/821 and OECD due diligence guidance for Responsible supply chains of minerals from conflict-affected and high-risk areas), in any products that we purchase or manufacture within our organization. However, we cannot achieve this on our own without the understanding and cooperation of our suppliers.

2 Purpose of Responsible Compliance for Conflict Minerals

The conflict minerals provision in the Dodd-Frank Wall Street Reform and Consumer Protection Act is based on the idea that minerals mined under unethical conditions in and around the Congo region—and later used in products—contributes indirectly to ongoing conflict. Similarly, the European Union has implemented its own conflict minerals regulations.

3 Applicable Scope

This policy applies to all employes, suppliers, and contractors of YASKAWA EMEA who are involved in the procurement of materials that may contain 3TG.

4 Yaskawa's Commitment

YASKAWA EMEA is committed to ethical business practices and the responsible sourcing of minerals. This policy outlines our commitment to ensuring that our products do not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries. YASKAWA complies with applicable laws and regulations regarding minerals, including Section 1502 of the U.S Dodd-Frank Act and the EU regulation 2017/821.

4.1 Qualitative Objectives

YASKAWA EMEA will implement and maintain a due diligence process that is aligned with the OECD Due Diligence Guidance for responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

YASKAWA EMEA is committed to respect human rights and avoid contributing to conflict through our purchase of products that may contain the 3TG minerals.

YASKAWA EMEA will not use suppliers that, contribute to serious human rights abuses (e.g., child labour, forced labour, torture), that directly or indirectly support non-state armed groups, that contribute to corruption, bribery, or fraudulent misrepresentation in their supply chain.

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4.2 Quantitative Objectives

YASKAWA EMEA will establish strong company management systems and conduct risk assessments to ensure that our products do not contain any minerals originating from Conflict-Affected and High-Risk areas.

We will maintain that a Conflict Minerals Policy is signed by 80% of our suppliers that could be affected by 3TG minerals in their products within 2025.

During 2025, 95% of our supply chain-related employees should have received training in due diligence processes.

4.3 Risk Management

YASKAWA EMEA will immediately devise, adopt and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to the non-state armed groups in the conflict-affected and high-risk areas.

4.4 Money Laundering and Bribery

Where YASKAWA EMEA identifies a reasonable risk that the minerals contained in the products we purchase may be linked to money laundering we will take appropriate steps to address these risks. These steps may include enhanced due diligence of our suppliers, risk assessment, engagement with upstream suppliers to encourage responsible practices, and, where necessary, disengagement from suppliers that fail to address identified risks.

YASKAWA EMEA will not offer, promise, give or demand bribes at any stage of the supply chain. We will actively resist and report any solicitation of bribes intended to conceal or misrepresent the origin of 3TG minerals.

5 Expectations for suppliers

Based on the conflict minerals compliance policy above, YASKAWA EMEA requests suppliers to investigate their materials for conflict minerals. An investigation method is supposed to track supply chains back to smelters, and to judge if smelters are appropriate.

To steadfastly comply with the conflict minerals provisions and regulations, YASKAWA EMEA expect suppliers to:

- Conduct their own due diligence on the source and chain of custody of conflict minerals,
- Comply with this policy as well as the OECD Due Diligence Guidance for responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Provide YASKAWA EMEA with accurate and complete information using the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT)
- Confirm that their products do not contain minerals that originate from conflict areas, by performing their own due diligence system
- Implement robust internal controls to prevent bribery and fraudulent misrepresentations.

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6 Cooperation and Remediation

Suppliers, employees, and stakeholders are encouraged to report concerns or suspected violations of this policy, including the use of non-conformant smelters or minerals linked to armed conflict.

The YASKAWA EMEA primary point of contact is through procurement.compliance@yaskawa.eu

As an alternative, information can be submitted personally or anonymously via the Yaskawa Whistleblowing System: <https://www.yaskawa.eu.com/about-yaskawa/Compliance/whistleblowing>

We will treat all reports seriously and investigate them in a timely, confidential, and fair manner

In the event that a supplier fails to comply with this Conflict Minerals Policy, including the provision of accurate information or participation in due diligence activities, YASKAWA reserves the right to:

- Require a corrective action plan within a defined timeline.
- Monitor progress and request evidence of remediation.
- Suspend new orders or business engagements until non-compliance is resolved.
- Terminate the supplier relationship in cases of wilful non-compliance or failure to remediate.

7 Conclusion

YASKAWA EMEA assumes no direct obligation to comply with the Dodd-Frank Wall Street Reform and Consumer Protection Act and conflict mineral regulations in EU. However, it is necessary for us to make serious efforts for the purpose of stabilization of the situation in the regions surrounding the Congo and other countries in conflict areas as per definition in the EU/2017/821. Therefore, YASKAWA EMEA requires cooperation from all employees, suppliers and other business partners to meet its compliance obligations.

Hattersheim 2025-08-01



Philip Nicholson

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