

Planmeca Group – Conflict Minerals Policy Statement

Introduction

Planmeca Group is committed to continuously developing corporate responsibility in its operations. Prohibiting the use of conflict minerals is an integral part of this mission. The purpose of this Conflict Minerals Policy Statement is to ensure that Planmeca Group companies, employees and suppliers comply with all applicable conflict minerals laws globally in their day-to-day business activities.

This Conflict Minerals Policy Statement has been drafted since the compliance with conflict minerals laws is in the best interest of Planmeca Group. Any conduct that is against applicable conflict minerals laws is not only illegal, but also weakens the business efficiency. Additionally, monetary penalties and reputational risks related to such infringements are significant.

The management of Planmeca Group requires all Planmeca Group employees to comply with applicable conflict minerals laws. Supervisors must ensure that all Planmeca Group employees understand the contents of this policy and comply with it.

Planmeca Group's Head of Compliance and Corporate Responsibility and Chief Financial Officer have oversight over this policy. Head of Compliance and Corporate Responsibility and Chief Financial Officer shall have the authority and duty to report any breaches to the management. Sufficient resources shall be given to Head of Compliance and Corporate Responsibility and Chief Financial Officer to ensure that Planmeca Group complies with this Conflict Minerals Policy Statement.

Scope of the policy statement

Planmeca Group has adopted this Conflict Minerals Policy Statement with respect to its global operations. This includes all group companies, joint ventures, partnerships, and business segments. This policy applies to all Planmeca Group employees, including the management.

Planmeca Group will reasonably endeavor to influence entities not controlled by Planmeca Group, but acting on its behalf, to implement their own sufficiently similar policies in order to mitigate the risk of violating any applicable conflict minerals laws.

This Conflict Minerals Policy Statement should be read in conjunction with Planmeca Group's Global Code of Conduct. Each and every employee of Planmeca Group has a responsibility to comply with this Conflict Minerals Policy Statement.

For the avoidance of doubt, conflict minerals laws do not apply directly to Planmeca Group. The EU regulation 2017/821 only applies directly to EU-based importers of tin, tantalum, tungsten and gold, whether these are in the form of mineral ores, concentrates or processed metals. Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 also only applies to companies filing reports with the United States Securities and Exchange Commission. However, Planmeca Group does require its suppliers to comply with applicable conflict minerals laws.

Definitions

“Chief Financial Officer” means the Chief Financial Officer of Planmeca Group.

“Conflict minerals” refer to any conflict minerals as defined in conflict minerals laws, such as tin, tungsten, tantalum and gold.

“Conflict minerals laws” refer to 1) Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 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 areas and 2) Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502.

“Distributor” refers to any distributor of a Planmeca Group company.

“Employee” means the employees, officers, supervisors, and directors of a Planmeca Group company.

“Head of Compliance and Corporate Responsibility” means the Head of Compliance and Corporate Responsibility of Planmeca Group.

“Management” refers to Planmeca Oy’s Board of Directors and Management Board.

“Planmeca Group” refers to Planmeca Oy and all of its direct and indirect subsidiaries and all of their employees, officers, directors, and anyone acting on behalf of Planmeca Group, including third parties.

“Stakeholder” means any supplier, distributor, or other stakeholder of Planmeca Group.

“Supervisor” refers to an employee of Planmeca Group who has one or more persons reporting to them.

“Supplier” means any Planmeca Group supplier.

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Planmeca Group is committed to sourcing components from suppliers whose products do not contain conflict minerals (tin, tantalum, tungsten, or gold) originated from conflict and high-risk areas.

Suppliers are expected to implement the principles of this Policy Statement and Planmeca Group’s Distributor and Supplier Code of Conduct in their own sourcing processes to ensure both the accurate source and the safety of the products and materials. Suppliers must be able to present formal evidence of their material sources if requested by Planmeca Group. Suppliers shall also ensure that their products do not contain conflict minerals (tin, tantalum, tungsten, or gold) originated from conflict and high-risk areas. Suppliers shall also ensure their sub-suppliers comply with this Policy Statement and Planmeca Group’s Distributor and Supplier Code of Conduct as well as any applicable conflict minerals laws and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Training and certification

Where applicable, all new Planmeca Group employees and stakeholders must certify that they have access to this Conflict Minerals Policy Statement, that they have received, read, and understood it, and that they will comply with this policy for the whole duration of their employment. Annual trainings and relevant certifications will be directed to employees working in identified risk areas and stakeholders as required.

Whistleblowing

All Planmeca Group employees are encouraged to report suspected breaches or misconduct to their supervisors. If employees do not feel comfortable doing this, they can always report the matter to a representative of the Human Resources, Legal or Compliance departments, or to any management representative. To foster a speak-up culture and to comply with applicable laws, Planmeca Group operates a whistleblowing channel, in which reports of misconduct can also be made. Each Planmeca Group employee is encouraged to report any breaches or suspected breaches they encounter, regardless of whether they concern the law, applicable regulations, our own Global Code of Conduct, or this Conflict Minerals Policy Statement.

Through the whistleblowing channel, all Planmeca Group employees and stakeholders are able to report any witnessed or suspected violations confidentially and anonymously. Breaches or suspected breaches can be reported even when the reporting party is not absolutely certain of whether a breach has been committed or not. However, the reporting party must have just cause to suspect that a breach was committed.

Planmeca Group is prohibited from retaliating against the reporting party for reporting any breaches or suspected breaches. Planmeca Group is also prohibited from attempting to prevent a person from reporting information on breaches.

Planmeca Group counts on each employee and stakeholder to do the right thing and act in the best interests of Planmeca Group.

Further information

If you have any questions regarding this policy, or if you are unsure of the right course of action, you can always contact the Planmeca Group's Compliance Department by email at compliance@planmeca.com.

In case you wish to report a case on the whistleblowing channel, you can access the whistleblowing channel here: <https://report.whistleb.com/en/planmeca>.

Changes to this policy statement

This Conflict Minerals Policy Statement is maintained by Planmeca Group's Compliance Department.

The mandatory reviewer of this policy is Planmeca Group's Head of Compliance and Corporate Responsibility.

The mandatory approver of the policy is Planmeca Group's Chief Financial Officer.

The English version of this policy has been approved. The approved version will be translated into applicable languages.

Version history

Originally published on 3.6.2024

References

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: <https://www.oecd.org/corporate/mne/mining.htm>

Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 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 areas: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L:2017:130:TOC>

Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502: <https://www.congress.gov/bill/111th-congress/house-bill/4173/text>