KONGSBERG

Kongsberg Gruppen ASA

Directive for Conflict Minerals Policy

KOG-DIR-0048

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1. Introduction

1.1 Document history

Revision	Date	Change description
A	21APR2021	Update of policy to comply with EU regulations and specifying that we include cobalt. Formalizing content according to standard template for governing documents.

1.2 Referenced Documents

Reference and Title	Doc ID	(Rev./Date)	(Publisher)
[1] Supplier conduct principles	KOG-DIR-0038		KOG

1.3 Objective

This directive specifies KONGSBERGs policy regarding conflict minerals.

1.4 Scope

This document applies to all companies within the KONGSBERG Group of companies, ref the description in KOG-GOV-0013, chapter 2.2.1 “Our relationship with jointly owned companies”.

1.5 Deviation

Deviations from this directive shall be authorized by the document approver (defined on the front page).

1.6 Basic principles

Conflict Mineral – The term “conflict mineral” means – (A) columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or (B) any other mineral or its derivatives

RMI – Responsible Minerals Initiative, founded in 2008 by members of the Responsible Business Alliance and the Global e-Sustainability Initiative, the Responsible Minerals Initiative has grown into one of the most utilized and respected resources for companies from a range of industries addressing responsible mineral sourcing issues in their supply chains.

CMRT - The Conflict Minerals Reporting Template is a free, standardized reporting template that facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized. The template also facilitates the identification of new smelters and refiners to potentially undergo an audit via the Responsible Minerals Assurance Program.

1.7 Roles and responsibilities

The Business Areas are responsible for ensuring that this directive is implemented in its own organisation. Each Business Area is also responsible for ensuring awareness and compliance with the directive within its own organisation. Responsibility for performing risk based compliance due diligence and managing risk in the supply chain is the individual area and subordinate units. The business area themselves decide how to organise their work with the supply chain.

2. Policy

KONGSBERG supports and respects the protection of internationally proclaimed human rights (such as the United Nations Universal Declaration of Human Rights), and we shall take steps to ensure that we are not complicit in human rights abuses. We expect our suppliers to do the same.

Conflict minerals are natural resources used to finance armed groups, fuel forced labour and other human rights abuses, and support corruption and money laundering. In order to comply with regulatory and customer requirements regarding the prohibition and restriction of conflict minerals, KONGSBERG policy prohibit the use of conflict minerals, unless the minerals are bought from responsible sources.

We shall use the Responsible Minerals Initiative's (RMI) Conflict Minerals Reporting Template (CMRT) to facilitate the transfer of information through the supply chain regarding 3TG (tin, tantalum, tungsten, and gold, including their derivatives) country of origin and the smelters and refiners being utilized.

KONGSBERG is committed to continuing to develop our due diligence systems to apply to the sourcing of materials beyond 3TG. As a first step, we have broadened our responsible material management system to include cobalt, which is used in the production of lithium ion batteries and are using the tools and programs of the RMI. We expect suppliers to follow this same framework and to participate in cobalt due diligence processes and capability building efforts around responsible minerals sourcing.

3. Effective date

This document becomes operative from the date the document is signed and authorized.