



## Conflict Minerals Sourcing Policy

Conflict Minerals Statement NTS Group  
Last modified on November 2020  
Status: Version 1.0

NTS Group requires its direct suppliers to source from smelters that are at least part of the Responsible Minerals Initiative (hereafter: RMI) Standard Smelter List (formerly known as Conflict Minerals Sourcing Initiative). In addition, NTS Group strongly prefers and encourages direct suppliers to source from smelters that are compliant with the Responsible Minerals Assurance Process (hereafter: RMAP) which was formerly known as the Conflict-Free Smelter Program (hereafter: CFSP) (<http://www.conflictreesourcing.org/conflict-free-smelter-refiner-lists/>). The RMAP can be explained as follows: “... it uses an independent third-party audit of smelter/refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The audit employs a risk-based approach to validate smelters' company level management processes for responsible mineral procurement” (<http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/>). Hence, NTS Group has a pro-active approach towards avoiding the sourcing of conflict minerals from the DRC region and surrounding countries.

NTS Group supports sourcing from the DRC region as long as it is validated to be conflict free. However, NTS Group does not want to have suppliers/smelters in its supply chain that are located in fully embargoed countries: Cuba, Iran, North-Korea (Democratic People's Republic of Korea), Sudan, Syria, and Regions of Crimea and Sevastopol.

### Implementation

NTS Group's Conflict Minerals Sourcing Policy (hereafter: CMSP) has been implemented since 2015. (Purchasing) employees of NTS Group, that are in direct contact with direct suppliers that source from smelters, have been informed on the issue of conflict minerals and are trained in supplier interaction regarding 3TG. NTS Group's ambition is to have 100% of its smelters in its supply chain to be RMAP compliant.

### Direct suppliers

NTS Group requires its direct suppliers to be DRC conflict-free. Therefore, NTS Group's CMSP is often communicated to its direct suppliers. With each purchasing order involving 3TG, NTS Group refers to its CMSP in its purchase conditions. In addition, NTS Group sends a yearly email with its CMSP policy to its direct suppliers. Finally, on a yearly basis NTS Group fills out a CMRT template in close collaboration with its direct suppliers.

### Regularly updated

NTS Group's CMSP is updated on a yearly basis to allow for revisions and to report improvements in regards to the percentage of smelters in NTS Group's supply chain that are RMAP compliant. Together we are moving towards a better future!

**Peter Van Oijen**

A handwritten signature in blue ink, appearing to read 'Peter Van Oijen', is written over a light blue horizontal line.

Director Global Sourcing NTS Group