



# ESAB Corporation

## CONFLICT MINERALS POLICY

### Purpose

This document contains ESAB Corporation's policy regarding the use and sources of conflict minerals in its products. As used in this policy, "ESAB" includes ESAB Corporation and its subsidiaries. This policy will be reviewed and updated as needed.

### Regulatory Overview

ESAB is subject to the U.S. Conflict Minerals Rule. Under that rule, to the extent that "conflict minerals" are necessary to the functionality or production of products that ESAB manufactures or contracts to manufacture, we are required to engage in a reasonable country of origin inquiry to determine whether the conflict minerals originated in the Democratic Republic of the Congo (the "DRC") or one of the other covered countries under the U.S. Conflict Minerals Rule. Additional inquiries and disclosure obligations are triggered to the extent that the conflict minerals are from a covered country or we are unable to determine the source of the conflict minerals.

"Conflict minerals" are defined in the U.S. Conflict Minerals Rule as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin, tantalum and tungsten. In this policy, we sometimes refer to those minerals and derivative metals as "3TG." In addition to the DRC, the covered countries contemplated by the U.S. Conflict Minerals Rule are: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

The European Union also has adopted a Conflict Minerals Regulation. Although ESAB is not required to comply with the EU Conflict Minerals Regulation, compliance with the spirit of that regulation is aligned with our general policies on responsible sourcing and human rights. The geographic scope of the EU Conflict Minerals Regulation is broader than that of the U.S. Conflict Minerals Rule. The EU Conflict Minerals Regulation applies to "conflict-affected and high-risk" areas worldwide, since it is intended to promote responsible sourcing globally of 3TG. Although there are some technical differences in the definitions of "conflict minerals" under the U.S. Conflict Minerals Rule and the EU Conflict Minerals Regulation, for purposes of this policy, we use the broader definition under the U.S. rule.

### ESAB's Policy Statement

ESAB takes its obligations under regulations seriously. ESAB also has adopted this policy as part of our efforts to encourage our suppliers to respect human rights and not contribute to conflict. In addition, ESAB is committed to conducting due diligence regarding the 3TG in our supply chain to assess risk exposure. ESAB requires the cooperation of its suppliers in the implementation of this policy and in enabling ESAB to meet its compliance obligations on a timely basis.

Our sourcing decisions take into account workers' rights and livelihoods. Accordingly, we do not seek to embargo responsibly sourced 3TG from conflict-affected and high-risk areas.

## **Supplier Requirements**

Suppliers who supply or manufacture components, parts or products containing 3TG are expected to source 3TG from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict. Without limiting the foregoing, suppliers are expected to directly and indirectly source 3TG only from sources that do not directly or indirectly benefit or finance “armed groups” (as that term is defined in the U.S. Conflict Minerals Rule) in the DRC or another covered country and that do not otherwise support or contribute to conflict.

In furtherance of this policy, our suppliers are expected to:

- implement and communicate to their personnel and suppliers policies that are consistent with this policy;
- put in place procedures for the traceability of 3TG at least to the smelter or refiner level, working with their direct and indirect suppliers as applicable;
- where possible, source 3TG from smelters and refiners that are conformant with an independent “conflict free” assessment protocol;
- maintain reviewable business records supporting the sources of 3TG;
- from time to time, at ESAB’s request, provide to ESAB written certifications and other information concerning the origin of 3TG included in components, parts and products supplied to ESAB and the supplier’s compliance with this policy generally;
- otherwise establish policies, due diligence frameworks and management systems that are consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its related supplements; and
- encourage their direct and indirect suppliers to adopt policies and procedures that are consistent with those contained herein.

Suppliers also are encouraged to support industry efforts to enhance traceability and responsible practices in global minerals supply chains.

ESAB reserves the right to request from any supplier at any time such information, certifications and documentation as it shall deem necessary to monitor or assess compliance with this policy.

## **Assessing and Responding to Identified Risks**

ESAB believes in establishing and maintaining long-term relationships with suppliers whenever possible. If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe. Continued failure to adhere to ESAB’s policies and refusal to address issues of concern may lead to termination of our business relationship with the supplier. Nothing contained in this policy shall be interpreted to preclude ESAB from terminating any supplier relationship at any time for any reason.

## **Grievance Mechanism and Reporting**

Concerns regarding this policy, or violations, can be reported as follows:

Via e-mail to:

[conflict.minerals@esab.com](mailto:conflict.minerals@esab.com)

By mail to the following address:

ESAB Corporation Conflict Minerals Program  
Attn: Legal Department  
909 Rose Avenue, 8<sup>th</sup> Floor  
North Bethesda, MD 20852

Suppliers are encouraged to in the first instance contact their regular sourcing channel if they have any questions concerning this policy.

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