

Conflict Minerals Policy

Tecnint HTE recognizes the importance of actively contributing to the prevention and mitigation of violence, human rights violations, and environmental degradation associated with the extraction and commercialization of certain minerals.

In particular, the Company is aware of the risks related to gold, tin, tantalum, and tungsten (3TG), as well as their derived minerals – cassiterite, columbite-tantalite, and wolframite – originating from the African Great Lakes region, commonly referred to as the “Conflict Region,” which includes the Democratic Republic of the Congo (DRC) and neighboring countries. Revenues generated from the extraction and trade of these minerals in such areas may contribute to the financing of armed groups and to the occurrence of serious human rights abuses, including human trafficking, slavery, forced and/or child labor, torture, and war crimes.

In 2010, the U.S. Securities and Exchange Commission (SEC) issued regulations concerning disclosure and reporting requirements related to “Conflict Minerals,” as set forth in Section 1502 of the *Dodd-Frank Wall Street Reform and Consumer Protection Act*. These provisions require manufacturers to disclose whether products they manufacture contain conflict minerals that are necessary to the functionality or production of such products.

Subsequently, in 2017, the European Parliament and the Council of the European Union adopted Regulation (EU) 2017/821, establishing due diligence obligations for Union importers of minerals and metals originating from conflict-affected and high-risk areas.

Tecnint HTE declares that it does not directly import minerals or metals, regardless of their origin, and commits to:

- not intentionally sourcing materials or components containing gold, tin, tantalum, or tungsten originating from mines located in the “Conflict Region” that are not certified as “Conflict Free”;
- ensuring compliance with applicable regulatory requirements by requesting its suppliers to implement appropriate assessment and traceability processes throughout their supply chains, in order to ensure that the specified metals originate exclusively from:
 - mines and smelters located outside the “Conflict Region”; or
 - mines and smelters located within the “Conflict Region” that have been certified as “Conflict Free” by recognized independent third-party entities.

Tecnint HTE has obtained, or is in the process of obtaining, information from its suppliers regarding the origin of the raw materials used in the production of gold, tin, tantalum, and tungsten that are incorporated into the materials and components supplied to the Company.

The objective of this Policy is to ensure that only “Conflict Free” materials and components are used in the products and services purchased by Tecnint HTE.

Should the use of minerals extracted or processed in facilities not considered “Conflict Free” be identified in any material, part, or component purchased by Tecnint HTE, the Company shall promptly implement appropriate corrective actions to render the product compliant with the requirements of this Policy.

Osnago, January 20, 2026

The CEO

