

Annual Report on Regulation EU 2017 / 821, Art. 7

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1 Introduction

Conflict Minerals’ are defined as tantalum, tin, tungsten, and gold (collectively, ‘3TG’) and their derivatives. While the Dodd-Frank Act defines ‘covered countries’ as the Democratic Republic of Congo and adjoining countries, the European Conflict Minerals Regulation (EU) 2017/821 is extending the definition to “conflict-affected and high-risk areas” (CAHRAS), as described on the website <https://www.cahraslist.net/>.

Related supply chain risks according to the OECD Guidance can be: armed conflicts and serious human rights violations; any forms of forced labour; the worst forms of child labour; indirect support to non-state armed groups; public or private security forces; bribery and fraudulent misrepresentation of the origin of minerals; money laundering;

2 Company Overview

vosla is a developer and producer in OEM and aftermarket automotive lighting, airfield lighting, special lighting e.g. for railway and customized LED solutions.

For over 75 years our motivation has been the perfection of light. Our products and innovations are tailor-made for challenging applications. We are proud of our precision, grown from our craftsmanship and quality dedication. In short, what we offer is “German Precision”.

1 <https://www.vosla.com/en/facts-and-figures/>

3 Assessment Summary

vosla has undergone Downstream Assessment / Audit based on Regulation EU 2017 / 821, Art.6. This assessment took place in November 2023 and was conducted by an external and independent 3rd party auditor.

The recommendations contained therein are implemented systematically on schedule.

The links to the assessment summary report can be found under this URL:

<https://www.vosla.com/wp-content/uploads/Zusammenfassung-Auditbericht-Verordnung-EU-2017-821.pdf>

4 Supply Chain Policy

vosla has a supply chain policy on responsible sourcing. This policy is included into the General Terms & Conditions of **vosla** GmbH and has been part of the Downstream Assessment / Audit based on Regulation EU 2017 / 821, Art.6.

https://www.vosla.com/wp-content/uploads/FB-4078_AGBs-der-vosla-GmbH_2023-03-27.pdf

5 Company Management System

5.1 Responsibilities to ensure Regulation (EU) 2017 / 821

vosla CEO: Is delegating staff to develop and implement an appropriate process to fulfill the Conflict Minerals Program and requirements of Regulation (EU) 2017 / 521.

vosla Head of Quality: Responsibility for the process. All responsibilities and processes are part of the vosla management system, document U3-Quality.

vosla Head of Purchasing: All responsibilities and processes are part of the vosla management system, document U4-Prurchasing.

vosla Head of Finance: Deployment of an annual list of all suppliers and their products that have a Customs Tariff number that includes Conflict Minerals, in accordance with EU 2017/82

<https://www.vosla.com/wp-content/uploads/Beschreibung-zu-Conflict-Minerals-Beschwerdemanagement.pdf>

5.2 Risk Management in the Supply Chain

5.2.1 CMRT-Reports from suppliers

vosla is using the Conflict Minerals Reporting Template (CMRT) provided by the Responsible Minerals Initiative (RMI). After receiving the filled CMRT from a supplier checks are carried out. Smelters named in the CMRT-report by the supplier are subject of cross check with the RMI smelter list.

5.2.2 Vosla-own CMRT-report for customers and stakeholders

This report is published on annual base.

<https://www.vosla.com/downloads/>

5.2.3 Supplier self-assessment

vosla has implemented an own supplier self-assessment questionnaire (doc. nbr. FB 4029). Each new and each existing supplier has to fill in.

vosla follows up with suppliers to track the status of their Conflict Minerals compliance efforts. If no response – suppliers involved will be reminded by e-mail and asked whether our request has been understood.

5.2.4 Supplier risk-assessment

vosla has implemented an own supplier risk assessment questionnaire (doc. nbr. FB 2508). Input from assessments above mentioned is filled to rate the potential supplier.

In case a supplier does not deliver reasonable effort, the Conflict Minerals Team escalates to senior management (via Executive Sponsor) and if appropriate, sanctions can be used.

5.3 Complaints regarding Conflict Minerals and Regulation (EU) 2017 / 821

A separate e-mail address is available for complaints and information in this regard. This e-mail address is published on our homepage. The procedures and mechanisms following receipt of such an e-mail are published there as well.

<https://www.vosla.com/wp-content/uploads/Description-of-Conflict-Minerals-Complaint-Management.pdf>

5.4 Reporting

The progress is reported weekly to the **vosla** CEO within the Purchasing- Quality-Logistics Meeting. A summery reporting is part of the annually Management Review. This part of the review is published.

<https://www.vosla.com/wp-content/uploads/vosla-Management-Bewertung-fuer-2022-bzgl.-Conflict-Minerals.pdf>

6 Conclusion

In case a supplier does not deliver reasonable effort, the Conflict Mineral Team, see 5.1, escalates to **vosla** CEO, sanctions can be a result of this.

Identified risks cannot be minimized with economically appropriate measures. A tungsten wire supplier was therefore switched. Consequently, vosla is not a Union Importer of this material.