



Conflict Minerals Policy

On 1 January 2021 a new law came into full force across the EU – the Conflict Minerals Regulation. The Conflict Minerals Regulation aims to help stem the trade in four minerals – tin, tantalum, tungsten and gold – which sometimes finance armed conflict or are mined using forced labour.

The Conflict Minerals Rule requires publicly traded companies to disclose their use of Conflict Minerals and whether those minerals originated in the Covered Countries. These minerals – tin, tantalum, tungsten and gold – also known as 3TG, are used in a wide range of products across numerous industries. Regulators believe that by encouraging public disclosures regarding the source and movement of Conflict Minerals across the supply chain, companies will be prompted to procure minerals from credible and conflict-free sources. Buying from conflict-free sources will result in the cutting of funding of acts of violence and human rights violations that are being sponsored by revenues generated from the extraction of, and trade in, Conflict Minerals. This policy reflects Audivo's commitment and its expectations of its product suppliers regarding actions to be taken to address Conflict Minerals.

As used in this Policy:

the term "**Conflict Minerals**" means the 3TG minerals listed above or their derivatives or any other mineral or its derivatives determined by the EU – Conflict Minerals Regulation to be financing conflict in Covered Countries; and

the term "**Covered Countries**" includes the above listed countries or any other country determined by the EU – Conflict Minerals Regulation or United States Secretary of State from time to time references to "**we**," "**us**," "**our**," the "**Company**," and "**Audivo GmbH**" are to Audivo GmbH and its subsidiaries.



1. Audivo's Policy Statement

As reflected in *Audivo's Health and Safety Presentation and Supplier Management Policy*, Audivo supports and respects the protection of human rights for all, including the basic human rights of employees and workers. We aim to uphold the human rights of all those affected by our business activities, and in particular, of the workers engaged in our supply chain. Accordingly, we are committed to sourcing components and materials from suppliers that share our values regarding respect for human rights, integrity, and environmental responsibility and that comply with applicable legal standards and requirements. Audivo acknowledges the existence and importance of human and environmental issues.

As a potential downstream user of products that may contain Conflict Minerals, Audivo recognizes its added value in protecting human rights and in taking global steps to interrupt the funding of groups conducting crimes against humanity. As part of Audivo's commitment to corporate responsibility and respecting human rights in our operations and in our global supply chain, it is Audivo's goal to seek using tantalum, tin, tungsten and gold in our products, provided such minerals do not, directly or indirectly, finance or benefit armed groups in the Covered Countries ("conflict free"), or in any conflict-affected and high-risk areas.

We are committed to complying with the requirements of the Conflict Minerals Rule applicable to us and implemented due diligence practices to identify the source of the Conflict Minerals in our supply chain.

2. Actions to Responsible Sourcing

In support of this policy Audivo:

- Continues to develop internal and external communication plan regarding Conflict Minerals;
- Assesses the Company's products that are likely to contain Conflict Minerals;
- Continues to raise supplier awareness of Conflict Minerals and have our suppliers identify the smelters that process the minerals they purchase;
- Requires Audivo's suppliers to provide us with completed Conflict Minerals declarations using the Conflict Minerals Reporting Template (CMRT) in its most up-to-date version;
- Provides and expects Audivo's suppliers to cooperate in providing due diligence information used in Audivo's supply-chain;
- Determines if identified smelters are DRC conflict free by using reliable information from industry associations;
- Continues to review the information we collect and assess the need to take remedial actions based on our values articulated in this Policy and our legal obligations, and in accordance with our risk management strategy;
- Maintains and requires our suppliers to maintain traceability data as reasonably sufficient to allow review of past years;
- Incorporates the principles of this policy into our contractual Purchase Order Terms and Conditions;
- Makes this policy publicly available on our website.



3. Audivo's Expectations from Its Suppliers

Audio expects the support of its suppliers in determining the origin of minerals used in their products, in using DRC conflict free minerals and in taking mitigating actions in case they discover they do use Conflict Minerals that do not qualify as DRC conflict free. To that end, Audivo expects its suppliers (and enforce their own suppliers, etc.) to have in place policies and due diligence measures that will enable Audivo to reasonably assure that products and components supplied to Audivo containing minerals are DRC conflict free.

Like many other companies tracking Conflict Minerals, it will take time for a company of our size and complexity to collect the information needed for us to fully understand our use of Conflict Minerals and therefore be able to address all related customer concerns.

In furtherance of this policy Audivo expects the following of its suppliers:

- **Supply "DRC Conflict Free" materials.** Audivo expects its suppliers to supply materials that are DRC conflict free;
- **Adopt Conflict Minerals policies.** Suppliers to Audivo must adopt a policy regarding Conflict Minerals consistent with Audivo's policy, implement management systems to support compliance with their policy and require their suppliers to take the same steps;
- **Send surveys to their suppliers, and complete Audivo's survey.** Audivo's suppliers are expected to pass the CMRT to their suppliers and successively upstream until the smelter/refinery is identified. The survey information must then be passed back down through the levels of the supply chain to Audivo's direct supplier, who then can complete such supplier's own Conflict Minerals Reporting Template;
- **Maintain Supporting Records.** Maintain reviewable business records supporting the course of conflict for a period reasonably sufficient to allow review of past years;

4. Grievance Mechanism and Reporting

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

- Contact us at: Audivo GmbH, Tel.: 0049943554190
- Email us at: conflictminerals@Audivo.com

This Policy will be reviewed regularly and updated as needed.