

Report 2024	Date: Version:	30.06.2025 1.1
USHIO Poland Sp. z o.o. - Report on actions taken to preserve due diligence		
Page 1		

INTRODUCTION

Ushio Poland Sp. z o.o. (hereinafter: **Ushio Poland** or **the Company**) is part of the international Ushio Group, which traces its roots back to Japan. Ushio is engaged in the production of specialised lamps for agriculture and industry. In the production process, the Company uses so-called conflict minerals, i.e. tin, tantalum, tungsten and their ores and gold (hereinafter: **3TG**). Ushio Poland imports them mainly from China as well as the European Union. The parent company in the Group's European structure and at the same time the main customer for Ushio Poland's products is the German company Ushio Germany.

The company's policy focuses particular attention on due diligence in the supply chain of conflict minerals. Ushio's activities in this regard are based on Regulation (EU) No 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas (OJ L 130, 19.5.2017, as amended by Delegated Regulation Commission (EU) 2020/1588 of 25 June 2020). As well as the guidelines OECD due diligence on responsible supply chains for minerals from conflict-affected and high-risk areas and the European Commission's Recommendation 2018/1149 of 10 August 2018 on non-binding guidelines on the identification of conflict-affected and high-risk areas and other risk factors in the supply chain under Regulation (EU) 2017 /821 of the European Parliament and of the Council.

The following report for 2024 provides an indication of the significant actions taken by the Ushio to meet its supply chain management system and risk management obligations. In addition, the report provides an overall year-over-year supply chain risk assessment.

Report 2024	Date: Version:	30.06.2025 1.1
USHIO Poland Sp. z o.o. - Report on actions taken to preserve due diligence		
Page 2		

REPORT FOR 2024

1. OVERALL SUPPLY CHAIN RISK ASSESSMENT

Ushio Poland is a trader operating at the "downstream of the supply chain" (as defined by the OECD Guidelines), which uses purchased raw materials to manufacture industrial products. Indeed, the Company is an entity operating at one of the last stages of the supply chain, as it uses raw materials already substantially processed in the form of, for example, wires, rods, electrodes, rings and other products made from, or containing, metals obtained from conflict minerals.

However, Ushio Poland, as a responsible entrepreneur, is aware of the risk of significant negative impacts that may be associated with the extraction of, trade in, processing and export of the minerals from which the metals it purchases are produced, from conflict-affected and high-risk areas. At the same time, the Company is fully aware that it is the duty of a responsible entrepreneur to respect human rights and not to contribute to conflicts. For this reason, the Company has adopted and implemented into its daily practice the Supply Chain Management Policy for Minerals from Conflict-Affected and High-Risk Areas [**RSCM Policy**].

As part of the RSCM Policy, the Company has implemented procedures that ensure it identifies smelters and refiners from which the Company's suppliers source 3TG raw materials imported by Ushio Poland. All smelters and refiners identified through this process participate in the *Responsible Minerals Assurance Process*, which ensures that their supply chains comply with the requirements set out by the OECD Guidelines. In addition, the Company has appropriate tools in place to identify risks in its supply chain. For these reasons, the year-round risk in its 3TG raw material supply chain should be assessed as **low**.

Report 2024		Date: Version:	30.06.2025 1.1
USHIO Poland Sp. z o.o. - Report on actions taken to preserve due diligence			
Done:	<i>Zubert Dwiejs</i>		Page 3
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2. SIGNIFICANT DUE DILIGENCE EVENTS

- The Conflict Minerals Supply Chain Management Policy has been updated to include provisions requiring supplier declarations, communicated to employees, and published on the Company's website.
- The internal RSCM procedure has been updated to include provisions requiring supplier declarations and has been communicated to employees.
- As part of the Policy, the Company confirmed and distributed to suppliers the requirement to annually complete and submit declarations regarding the smelters and refiners from which they source raw materials classified as "conflict minerals," using the CMRT [Conflict Minerals Reporting Template] form.
- Ushio Poland commissioned the preparation of a declaration template for suppliers of conflict minerals, which complements the declarations submitted via the CMRT form.
- Ushio Poland contacted suppliers from whom it purchases conflict materials, obtained completed CMRT forms, conducted their analysis, and archived the documentation.

This report is subject to publication on the official website of Ushio Germany.

