



Conflict Minerals Policy

Policy Title	Conflict Minerals Policy
Responsible Department	Group Legal
Geographical Scope	Global (all entities of Aebi Schmidt Holding AG)
Effective Date	July 1, 2025
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Approved by	General Counsel
Audited by	-
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Conflict Minerals Policy

Aebi Schmidt Holding AG and its direct and indirect subsidiaries endeavor to maintain the highest standards of ethical conduct and integrity in all areas of their business activities.

On August 22, 2012, the U.S. Securities and Exchange Commission adopted final rules to implement reporting and disclosure requirements related to “conflict minerals,” as directed by the Dodd-Frank Act.

The term “Conflict Minerals” is defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, tantalum, tin, tungsten, and any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo (DRC) or an adjoining country. The term “3TG” is defined as tantalum, tin, tungsten and gold and their compounds.

We are committed to working closely with our supply chain to ensure we fully comply with the requirements set forth in Section 1502 of the Dodd-Frank Act. We have implemented the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and are utilizing the conflict minerals reporting template (“CMRT”) owned by the Responsible Minerals Initiative (“RMI”), for exercising due diligence within our supply chain.

We do not knowingly source any product containing Conflict Minerals and we continue to work on our due diligence process in order to verify that the components we source do not contain Conflict Minerals. We have requested that our suppliers commit to responsible sourcing of 3TG used in the production of components supplied to us. We expect our suppliers to have in place policies and due diligence measures that will enable us to reasonably assure that products and components supplied to us containing 3TG are DRC conflict free. Our suppliers will be requested to perform due diligence to determine the source of any 3TG that are contained in the components that they supply to us. Our supplier’s due diligence must include, where applicable, completion of the RMI Conflict Minerals reporting CMRT.

Zürich, Switzerland
July 1, 2025