

## Safran Identity & Security Conflict Minerals Policy

### Purpose

Suppliers that produce goods containing tin, tantalum, tungsten or gold (3TG) must adopt a conflict minerals policy compliant with the Safran I&S Policy and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and High-Risk Areas (the “OECD Guidance”).

This Policy applies to all Safran I&S suppliers involved in the upstream supply chain, starting from smelters or refiners and ending at Safran Identity & Security.

### Supplier requirements

Suppliers shall exercise due diligence in accordance with the OECD Guidance, on their entire supply chain with respect to the sourcing of all 3TG contained in their products, to determine whether those metals directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses in high-risk areas.

Suppliers shall:

- Satisfy the reporting and sourcing requirements of this Policy,
- Provide to Safran I&S, whenever required, any information that can help identify the Supplier sourcing chain, in a format determined by Safran I&S end-customer.

Safran I&S reserves the right to audit Suppliers for compliance.

Suppliers that produce goods containing tantalum, tin, tungsten, or gold must adopt a conflict minerals policy that is consistent with the OECD Guidance. Suppliers must distribute their conflict minerals policy to all of their subcontractors and suppliers that provide materials for the manufacture of goods.

Suppliers may only use 3TG in goods if the Supplier can reasonably demonstrate that it has exercised due diligence in accordance with the OECD Guidance regarding the Source and chain of custody of such metals, and satisfied the reporting and sourcing requirements of this Policy.

If the Supplier cannot reasonably demonstrate it has exercised due diligence and it has satisfied the reporting and sourcing requirements of this policy, then the supplier must not use the affected metals in any goods.

The Supplier must provide to Safran I&S reasonable documentary evidence of the Supplier's reporting, sourcing and due diligence activities and shall make such records available to Safran I&S upon request.

The Supplier must distribute this Policy to all procurement personnel and factory management for all of the Supplier's facilities producing goods and must ensure their facilities' compliance with the obligations and requirements in this Policy.

### **Due diligence**

The OECD Guidance establishes a framework for exercising due diligence to determine the source and chain of custody of 3TG. Relevant due diligence procedures include, but are not limited to those listed below, in addition to the specified reporting and sourcing requirements:

- Suppliers must map their supply chain back to the point at which the metal was processed by the mineral processor (typically a smelter or a refiner). This must be reported to Safran I&S annually by completing the Conflict-Free Sourcing Initiative's Conflict Minerals Reporting Template (CMRT) to identify the smelters and refiners, where available, country of origin of the tantalum, tin, tungsten or gold used by the Supplier. This report must include complete information with respect to all of the Suppliers' subcontractors and suppliers and all metal smelters and refiners. Any changes or exceptions affecting the information disclosed by the CMRT within regular annual reporting period must be promptly reported to Safran I&S.
- Suppliers must only source 3TG, and products containing such metals from smelters and refiners that have been verified as "conflict-free" compliant, or have publicly demonstrated that they are progressing towards such conflict-free verification by an independent third party organization. A smelter can publicly demonstrate its progress towards conflict-free verification by engaging with an independent third-party audit program.
- If a Supplier becomes aware that it may have sourced minerals that directly or indirectly financed or benefited armed groups that are perpetrators of serious human rights abuses, the Supplier must immediately notify Safran I&S in writing. Such notification must include reasonable tracking information to identify which goods may contain the affected metals. Additional information will be provided to the Supplier following such notification.
- Suppliers must promptly notify Safran I&S of all failures to meet these reporting, sourcing and due diligence requirements, including, without limitation, any delay in providing a completed CMRT on a timely basis.