

3TG COMPLIANCE

The Conflict Minerals Rule, which was adopted under the Dodd-Frank Wall Street Reform and Consumer Protection Act, requires publicly traded companies that manufacture or contract to manufacture products containing tantalum, tin, tungsten or gold (“3TG”) that is necessary for the functionality or production of such products to take certain steps to determine the origin of such necessary 3TG, and to report their findings annually to the U.S. Securities and Exchange Commission (“SEC”). The Conflict Minerals Rule is intended by Congress to address the concern that trade in 3TG from the Democratic Republic of the Congo and surrounding countries is helping to finance the ongoing conflict and humanitarian crisis in that area.

The Regulation (EU) 2017/821 of the European Parliament and of the Council 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 is going in effect from 1st of January 2021

Thiim A/S does not directly source any 3TG from mines, smelters or refiners, and we are many levels from these market participants. We therefore require the cooperation of our suppliers with this policy to enable us to meet our SEC & EU compliance obligations. Unless otherwise indicated by the context, references in this policy to “Thiim A/S,” “we,” “its,” “us” and “our” refer to Thiim A/S and its controlled subsidiaries that manufacture or contract to manufacture products.

Thiim A/S has the following expectations of its suppliers of components for products that we manufacture or for products that we contract with them to manufacture:

- We expect our suppliers to promptly, completely and accurately respond to our informational requests with respect to any 3TG that is necessary to the functionality or production of such products, including by completing and delivering the Conflict-Free Sourcing Initiative Conflict Minerals Reporting Template or similar survey (the “Survey”) when asked to do so
- In order to fully and accurately complete the Survey, we expect our suppliers to (1) determine whether there is any 3TG in any such products, (2) survey their upstream suppliers regarding the ultimate source of any such 3TG, and (3) verify and document such information
- We expect our suppliers to implement policies and management systems to support compliance with these expectations and require their upstream suppliers to adopt similar policies and systems
- We expect our suppliers to cooperate in the event we determine that any further inquiry or due diligence is required or advisable with respect to the supply of 3TG in any such products

Thiim A/S believes in establishing and maintaining long-term relationships with suppliers whenever possible.

However, if we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe, or we may terminate our business relationship with such supplier. Nothing contained in this policy shall be



interpreted to preclude Thiim A/S from terminating any supplier relationship at any time for any reason.

Concerns regarding this policy, or suspected violations of this policy, can be reported to the following address:

Thiim A/S
Transformervej 31
2860 Søborg, Denmark

A handwritten signature in blue ink, appearing to read "Martin West".

Martin West
CEO of Thiim A/S