



# MAGNA CONFLICT MINERALS & CRITICAL RAW MATERIALS POLICY

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## 1 Scope

Magna is committed to respecting human rights and complying with principles and regulatory requirements regarding human rights and responsible business conduct. Ethics and integrity are key priorities in all our business activities. We continuously seek to generate economic, environmental and social added value, and deliver on our corporate responsibility. This includes processes to verify that the natural raw materials used in our products are sourced and produced in a way that is both ethical and consistent with our corporate policies.

Magna is committed to the responsible sourcing of raw materials used in the operation of our business and the manufacturing of our products. This includes conflict minerals such as tin, tungsten, tantalum and gold, as well as other raw materials that are considered to be critical in terms of negative social or environmental impacts from their extraction or sale. We expect the same level of commitment from our business partners, including our suppliers.

We expect our suppliers to comply with all existing legal requirements concerning the sustainable and responsible sourcing of raw materials. Suppliers are obliged to respect and promote human rights, protect natural ecosystems critical for maintaining biodiversity, and safeguard health and safety to further increase the resiliency of the supply chain and accelerate the transition to a sustainable world.

This document summarises Magna's sustainable sourcing approach. It outlines our commitment to sourcing sustainable raw materials and comprises our supplier expectations and requirements related to this topic. We expect our suppliers to respect the following frameworks and/or principles in order to meet or even exceed sustainability targets, provide sufficient supply chain transparency, and build more resilient supply chains:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) fundamental Conventions
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- Full transparency and traceability through the supply chain
- Only use raw materials smelters approved by the Responsible Minerals Initiative (RMI)

In addition to these frameworks and/or principles, our suppliers should also review the "Material Change" report of Drive Sustainability and the Responsible Minerals Initiative (RMI) as a guidance document on responsible sourcing. The report, commissioned by Drive Sustainability and the RMI, assesses the importance of 37 materials to the automotive and electronic industries, and evaluates environmental, social and governance risks for those materials at industry levels. The study recognises that businesses and entire industries working together can catalyse lasting change to improve peoples' lives and reduce pressures on vulnerable ecosystems in resource-producing countries.

Furthermore, we recommend our suppliers to use the Raw Material Outlook, a platform launched by Drive Sustainability to help in managing and remediating human rights risks and the environmental, social and governance (ESG) impacts of raw materials through value chain mapping and ESG risk identification. By using the Raw Material Outlook, companies can better develop collaborations and identify leverages to integrate sustainability throughout the global automotive supply chain.



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Any supplier to a Magna entity must comply with the following contractual documents:

- **Magna's Code of Conduct and Ethics** acts as a guide to help us maintain our ethical standards. Magna expects and requires every Magna employee to act in accordance with applicable law and consistent with our core values and business principles. We also expect our suppliers, consultants, independent contractors, agents and other representatives to meet these standards. Violations of this Code will lead to disciplinary action for employees, up to and including dismissal, and may result in termination of our business relationship with third parties.]
- **Magna's Supplier Code of Conduct and Ethics** outlines the operational principles of Magna and the demands we have for those suppliers providing goods or services to Magna. It forms an integral part of Magna's overall contractual relationship with each supplier. We expect the standards set out in this document to be met by our suppliers, even in jurisdictions where meeting such standards may not be considered part of the usual business culture.
- **Magna's Global Supply Chain Requirements** form the basis of our business relationship with our suppliers and define manufacturing, logistics and quality expectations, requirements and standards. In addition, the Manual also details necessary environmental, compliance and other sustainability requirements that have become critical to the industry. Suppliers are expected to comply with the requirements defined in this Manual.
- **Magna's Report on Fighting Against Forced Labour and Child Labour in Supply Chains** summarizes the steps that Magna has taken to prevent and reduce the risk of forced labour or child labour within our operations and supply chain.

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## 2 Conflict Minerals

### 2.1 Conflict Minerals Disclosure Rule

The U.S. Securities and Exchange Commission (SEC) rule (the “Rule”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) requires publicly traded companies subject to Securities Exchange Act of 1934 reporting requirements, to report annually on the use and source of ‘conflict minerals’ in their products. Conflict minerals are defined in the Rule as Gold, as well as Tin, Tantalum and Tungsten (and their derivatives Cassiterite, Columbite-Tantalite and Wolframite), which originate in the Democratic Republic of Congo or an adjoining country specified in the Rule (collectively the “Covered Countries”). The Rule was implemented to increase supply chain transparency with the aim of ending ongoing violent conflict in the Covered Countries that the U.S. Congress determined is being partially financed by revenues generated from the mining and transport of conflict minerals.

### 2.2 Commitment

We are committed to taking necessary steps to comply with the Rule and have implemented a global process to meet our obligations, and reporting to the SEC. We support industry-wide efforts to identify the source of conflict minerals and certify mines and smelters as “conflict free”.

### 2.3 Objectives and Actions

As required by the Rule, Magna is using the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from High Conflict Areas (the “OECD Guidance”), an international due diligence framework for meeting the requirements of the Rule. Magna is taking a number of actions in accordance with this framework, including:

- Supporting the requirements of the Rule, which requires the annual reporting of our reasonable country of origin inquiry with respect to conflict minerals, and if applicable, supply chain due diligence measures taken;
- Involvement as a member of industry associations in efforts to improve supply chain transparency and compliance with the Rule;
- Involvement as a member of the Responsible Minerals Initiative (RMI) which operates a program to improve, over time, the ability of companies to track and trace conflict minerals in their supply chain back to the smelter and mine of origin; and
- Strengthening our due diligence program and processes to identify the source of the minerals used in our products in accordance with the OECD Guidance.

### 2.4 Expectations

Magna is committed to sourcing components and materials from companies that share our values and commitment to human rights, ethics and environmental responsibility.

We require our direct suppliers to:

- Support our efforts to comply with the Rule by taking appropriate due diligence measures to determine the origin of minerals used in products supplied to Magna;
- Start immediate corrective actions where “critical” smelters have been identified;
- Increase awareness of the Rule’s reporting requirements among their own suppliers; and
- Obtaining information from their own suppliers with respect to the origin of minerals used in products ultimately supplied to Magna.

## 2.5 Communication

Questions regarding Magna's Conflict Minerals Program can be sent to our dedicated email address: [Conflict.Minerals@magna.com](mailto:Conflict.Minerals@magna.com). Concerns regarding this Policy Statement or Magna's Conflict Minerals Program can be communicated by phone or online through our confidential and anonymous Hotline by visiting magnahotline.com. Submissions to the Hotline are received and tracked by an independent third-party provider and will be reported to members of our Conflict Minerals team for review and appropriate action. This Policy Statement is available on our corporate website for reference by our customers, suppliers and other stakeholders.

## 3 Critical Raw Materials

Magna is committed to use only raw materials, whose extraction, production, transport, trade, processing and export neither directly, nor indirectly contribute to non-compliance, environmental pollution, human rights abuses or health & safety issues. As part of our risk assessment, the following raw materials have been identified as potential risk raw materials (listed in alphabetical order) relevant to Magna and were included in our human rights due diligence activities, as identified in the Drive Sustainability/RMI Material Change Report:

- Aluminium/Bauxite
- Cobalt
- Copper
- Graphite
- Leather
- Lithium
- Mica
- Natural Rubber
- Nickel
- Palladium
- Rare Earth Elements
- Steel/Iron
- Tin, Tantalum, Tungsten and Gold
- Zinc

Suppliers are expected to comply with the following general requirements:

- Conduct due diligence to understand the source of the raw materials.
- Use validated conflict free smelters and refiners for procurement.
- Wherever possible, suppliers should source raw materials from audited sources as a matter of principle. Independent, third-party assurance such as the Standard for Responsible Mining from the Initiative for Responsible Mining Assurance (IRMA) should be used. This comprehensive and internationally recognised standard offers third-party certification of industrial-scale mine sites for all mined materials that is governed equitably by the private sector, local communities, civil society and workers.
- Suppliers are obliged to provide eco-social Life Cycle Assessment (LCA) data upon request from Magna within a reasonable period.
- Suppliers shall avoid CO<sub>2</sub> emissions and other greenhouse gas (GHG) emissions. However, if CO<sub>2</sub> emissions cannot be avoided completely, the remaining CO<sub>2</sub> emissions shall be

compensated. In this case suppliers shall select compensation projects that are certified according to a recognized standard.

### 3.1 Aluminium/Bauxite

Identified environmental, social and governance aggregated risks:

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ High CO<sub>2</sub> emissions
- ⌚ Incidencies of conflict with Indigenous Peoples

Approach:

- ❖ As the production of aluminium causes high CO<sub>2</sub> emissions in the industry depending on the energy type used for electrolysis in primary smelting, the reduction of emissions due to the use of recycled aluminium has high priority and is mandatory. The use of aluminum made by electrolysis in primary smelting is only allowed, if the use of recycled aluminium is demonstrably not feasible considering technical and economic aspects.  
Magna recommends its suppliers to specifically seek cooperation with business partners using sustainable technologies for a green/low carbon aluminium production.
- ❖ Suppliers are expected to source aluminium certified by the Aluminium Stewardship Initiative (ASI). The ASI Performance Standard defines 59 environmental, social and governance principles and criteria, with the aim to address sustainability issues in the aluminium value chain. Suppliers are also strongly encouraged to become an ASI member. Collaborative initiatives are a proven model for companies in any industry to address the wide-ranging challenges of a sustainable supply chain. ASI is a global non-profit standards setting and certification organisation with the aim to foster responsible production, sourcing and stewardship of aluminium.
- ❖ Suppliers are expected to use aluminium certified according to the ASI Chain of Custody (CoC) Standard as a further step. The CoC Standard sets out requirements for the creation of a Chain of Custody for CoC Material, including ASI Aluminium, which is produced and processed through the value chain into diverse downstream sectors.
- ❖ Suppliers are expected to use aluminium sourced exclusively from raw material suppliers who are in compliance with existing international standards.

### 3.2 Cobalt

Identified environmental, social and governance aggregated risks:

- ⌚ Child labour and forced labour
- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ Countries experiencing high-intensity conflicts
- ⌚ Potential for harm from hazardous materials or chemicals

**Approach:**

- ❖ Suppliers providing products containing cobalt are requested to report on the origin and certification status of the mineral. We highly recommend our suppliers to make use of the tools and resources provided by the RMI to conduct due diligence on cobalt supply chains. For this purpose, the use of the Cobalt Reporting Template (CRT) is mandatory. The CRT is a standardized reporting template designed for downstream companies to gather and disclose information about their cobalt supply chain and to exchange information about mineral country of origin and the smelters and refiners that are utilized.
- ❖ Suppliers are expected to use cobalt sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### **3.3 Copper**

**Identified environmental, social and governance aggregated risks:**

- ⌚ Incidences of conflict with Indigenous Peoples
- ⌚ Potential for harm from hazardous materials or chemicals

**Approach:**

- ❖ Suppliers are expected to participate in the industry initiative Copper Mark to advance the sustainability of global copper value chains. The Copper Mark was initiated by the International Copper Association (ICA) and is an assurance framework to promote the responsible production of copper. It enables companies and organisations throughout the copper industry to better understand and meet the increasing demands for independently verified responsible production practices, and to contribute positively to sustainable development.
- ❖ The Copper Mark's standards "Criteria for Responsible Production" and "Joint Due Diligence Standard" combined with the site assessments provide up-to-date and credible information on responsible practices, strengthening transparency for investors, civil society, and companies using copper in their products.

### **3.4 Graphite**

**Identified environmental, social and governance aggregated risks:**

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption

**Approach:**

- ❖ Suppliers are expected to use graphite sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### **3.5 Leather**

**Identified environmental, social and governance aggregated risks:**

- ⌚ Countries with weak rule of law

- ⌚ Countries experiencing corruption
- ⌚ Potential for harm from hazardous materials or chemicals

Approach:

- ❖ All tanneries must meet the LWG (Leather Working Group) Gold Standard.
- ❖ All suppliers are expected that animal welfare best practices are followed.
- ❖ It is mandatory that all leather must be sourced from farms not located in illegally deforested, environmentally restricted or protected areas.
- ❖ All leather goods must be traceable to origin.

### 3.6 Lithium

Identified environmental, social and governance aggregated risks:

- ⌚ Child labour and forced labour
- ⌚ Incidences of conflict with Indigenous Peoples

Approach:

- ❖ Suppliers are expected to use lithium sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### 3.7 Mica

Identified environmental, social and governance aggregated risks:

- ⌚ Child labour and forced labour
- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption

Approach:

- ❖ Suppliers providing products containing mica are requested to report on the origin and certification status of the mineral. We highly recommend our suppliers to make use of the tools and resources provided by the RMI to conduct due diligence on mica supply chains. For this purpose, the use of the Mica Reporting Template (MRT) is mandatory. The MRT is a standardized reporting template designed for downstream companies to gather and disclose information about their mica supply chains and exchange information on mineral country of origin and processors being utilized.
- ❖ Suppliers are expected to participate in relevant industry initiatives such as the Responsible Mica Initiative. The Responsible Mica Initiative is comprised of international companies and non-governmental organisations and develops global standards for mica mining. These are intended to address fair working conditions, safety and minimum wages. Companies that join the Responsible Mica Initiative commit themselves to implementing these standards to establish a fair, responsible and sustainable mica supply chain.

- ❖ Suppliers are expected to use mica sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### 3.8 Natural Rubber

Identified environmental, social and governance aggregated risks:

- ⌚ Child labour and forced labour
- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ Incidences of conflict with Indigenous Peoples

Approach:

- ❖ Suppliers are expected to participate in the industry initiative Global Platform for Sustainable Natural Rubber (GPSNR) and to ensure that natural rubber is produced and processed in line with GPSNR policy requirements. The GPSNR is an international membership driven platform set up to define sustainability for the natural rubber value chain. It brings together various stakeholders to a common ground based on fairness, equity and environmental sustainability. Membership is diverse open to everyone in the natural rubber industry. This includes but is not limited to smallholders, civil society organisations, processors, traders, tire makers, car manufacturers and other downstream users. Half of the world's natural rubber demand already finds membership in the GPSNR.

### 3.9 Nickel

Identified environmental, social and governance aggregated risks:

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ Countries experiencing high-intensity conflicts
- ⌚ High CO<sub>2</sub> emissions
- ⌚ Incidences of conflict with Indigenous Peoples
- ⌚ Potential for harm from hazardous materials or chemicals

Approach:

- ❖ Suppliers are expected to use nickel sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### 3.10 Palladium

Identified environmental, social and governance aggregated risks:

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ High CO<sub>2</sub> emissions

Approach:

- ❖ Suppliers are expected to use palladium sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### 3.11 Rare Earth Elements (REE)

Identified environmental, social and governance aggregated risks:

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption

Approach:

- ❖ Suppliers are expected to use REE sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

### 3.12 Steel/Iron

Identified environmental, social and governance aggregated risks:

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ High CO<sub>2</sub> emissions
- ⌚ Incidences of conflict with Indigenous Peoples

Approach:

- ❖ As the production of steel causes high CO<sub>2</sub> emissions in the industry depending on the energy type used for smelting, the reduction of emissions due to the use of recycled steel has high priority and is mandatory. The use of primary steel is only allowed, if the use of recycled steel is demonstrably not feasible considering technical and economic aspects
- ❖ Magna supports innovative low-carbon technologies in steel and iron production that aim at reducing the global carbon footprint of the steel industry. One example for such a technology is the iron and steel making by using 100 % fossil-free hydrogen instead of coal and coke. With this technology, CO<sub>2</sub> emissions are significantly eliminated from the steel production process, which is key to the fight against global warming. Suppliers are expected to specifically seek cooperation with business partners using this green steel technology.
- ❖ Suppliers are expected to source steel products with a low carbon footprint.
- ❖ Suppliers are expected to participate in the industry initiative ResponsibleSteel. ResponsibleSteel is a global not-for-profit organisation and a multi-stakeholder standard and certification initiative aiming to enhance the responsible sourcing, production, use and recycling of steel. Suppliers are expected to use iron and steel certified against the ResponsibleSteel Standard.

### 3.13 Tin, Tantalum, Tungsten and Gold (3TG)

Identified environmental, social and governance aggregated risks:

- ⌚ Child labour and forced labour
- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ Countries experiencing high-intensity conflicts
- ⌚ High CO<sub>2</sub> emissions
- ⌚ Incidences of conflict with Indigenous Peoples
- ⌚ Potential for harm from hazardous materials or chemicals

Approach:

- ❖ Magna is concerned with the unintentional support of armed conflict through the use of certain minerals and metals originating from the Democratic Republic of Congo (DRC), its adjoining countries and high-risk areas (CAHRAs). Magna is strongly committed to achieve a conflict-free supply chain and use 3TG from responsible and conflict-free sources only. All direct suppliers providing products containing 3TG to any Magna facility are required to report on the origin and certification status of the metals. We highly recommend our suppliers to make use of the tools and resources provided by the RMI to conduct due diligence on conflict minerals supply chains. For this purpose, the use of the Conflict Minerals Reporting Template (CMRT) is mandatory. The CMRT is a standardised reporting template that facilitates the transfer of information through the supply chain regarding mineral country of origin and the smelters and refiners being utilized. The template also helps identifying new smelters and refiners to potentially undergo an audit via the RMAP.
- ❖ Suppliers are expected to use 3TG sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.
- ❖ For more information regarding our conflict minerals policy, please read Magna's Conflict Minerals Policy Statement.

### 3.14 Zinc

Identified environmental, social and governance aggregated risks:

- ⌚ Countries with weak rule of law
- ⌚ Countries experiencing corruption
- ⌚ Potential for harm from hazardous materials or chemicals

Approach:

- ❖ Suppliers are expected to participate in relevant industry initiatives such as the International Zinc Association (IZA), a representative trade body that fosters cooperation among zinc producers to develop new technologies and sustainably grow markets.
- ❖ Suppliers are expected to use zinc sourced exclusively from raw material suppliers who are audited in accordance with the IRMA standard.

## 4 Abbreviations

ASI	Aluminium Stewardship Initiative
CMRT	Conflict Minerals Reporting Template
CoC	Chain of Custody
CRT	Cobalt Reporting Template
DRC	Democratic Republic of the Congo
ESG	Environmental, social and governance
FPIC	Free, prior, and informed consent
GHG	Greenhouse gas
GPSNR	Global Platform for Sustainable Natural Rubber
HCS	High carbon stock
HCVs	High conservation values
ICA	International Copper Association
ILO	International Labour Organization
IPLCs	Indigenous Peoples and local communities
IRMA	Initiative for Responsible Mining Assurance
IZA	International Zinc Association
MRT	Mica Reporting Template
OECD	Organization for Economic Cooperation and Development
REEs	Rare Earth Elements
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
UN	United Nations
UNDRIP	UN Declaration on the Rights of Indigenous Peoples
UNGP	UN Guiding Principles of Business and Human Rights
3TG	Tantalum, tin, tungsten, gold





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