

Conflict Mineral Statement

NIBE Group are committed to ensuring the health, safety and protection of people who come into contact with our products and business, and we require high social, environmental and human rights standards among our suppliers. Managing our responsibilities in relation to Conflict Minerals is a part of this corporate responsibility.

Background

In August 2012, the United States Securities and Exchange Commission (SEC) issued its final rules regarding Conflict Minerals (known as 3TG – Tantalum, Tin, Tungsten and Gold) as defined in and required by section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. As a result, companies quoted on the US Stock Exchange are required to report the origin for Conflict Minerals coming from conflict and high-risk areas. In May 2017 a similar law was passed in the European Union called the EU Conflict Minerals Regulation (Regulation (EU) 2017/821). This law requires importers of 3TGs to report presence and origin of these minerals.

NIBE Group does not directly source or import Conflict Minerals and does not fall into the scope of the current legislation. But since these minerals are part of our global supply chain and used in a variety of materials and components which then becomes part of our products, NIBE Group are committed to sourcing responsible and work towards ensuring the use of conflict free minerals.

NIBE's commitments

We are working towards ensuring that our products do not contain Conflict Minerals that have been sourced from mines that support or fund conflict in conflict affected and high-risk areas. Therefore, we are committed to:

- identifying which NIBE products are impacted and targeting our efforts accordingly
- not buying products and materials containing Conflict Minerals directly from conflict mines
- asking our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to NIBE do not originate from conflict mines

NIBE's measures

We have taken the following actions in working towards our commitments:

- establishing procedures in management systems to respond to customer inquiries based on the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict affected and high-risk areas
- requiring our suppliers to implement a policy regarding Conflict Minerals and exercise due diligence to investigate the source of these minerals
- engaging with our suppliers so they respond in a timely manner to our requests for evidence of compliance. Our suppliers' willingness to comply with this initiative is a factor in our sourcing decisions
- updating the NIBE Supplier Code of Conduct and our purchasing terms and conditions to reflect this statement