



## **Due diligence report in accordance with EU Conflict Minerals Regulation (2017/821) for the 2024 financial year**

Date: March 26, 2025 (update December 16, 2025)  
Reporting period: January 1 – December 31, 2024  
Responsible person: Cora Mitschka, Procurement/ Supply Chain Compliance

### Background

- The aim of the regulation is to prevent the financing of armed conflicts and violence by rebel groups in connection with the extraction of diamonds and minerals by creating a Union system for due diligence in the supply chain.
- As a member of the Westlake Group, Westlake Vinnolit has been subject to the disclosure requirements of the Dodd-Frank Act on the NYSE since 2014.
- The only relevant mineral that Westlake Vinnolit sources and processes directly is tin.

### Measures to control raw materials used:

- To ensure that the raw materials we use to manufacture our products do not contain any conflict minerals, we request confirmation of this from all our raw material suppliers every year.
- Raw materials for which such confirmation is not issued by our suppliers may no longer be purchased.
- The query for 2024 has shown that none of the raw materials we use contain conflict minerals as defined by the EU Regulation.
- Since the 2024 financial year, we have been subject to the Supply Chain Due Diligence Act, which also stipulates due diligence obligations with regard to the use of conflict minerals. The risk analysis carried out in this context did not reveal any additional risks with regard to our direct suppliers.
- Before a new supplier and/or raw material is approved, the question of the use of conflict minerals must be clarified and confirmed/documentated accordingly.

Control measures for tin:

- We regularly purchase tin for our own use from a supplier in South America who provides all the necessary evidence of sustainable and responsible tin mining. In 2024, this supplier was our only source of tin.
- In order to monitor compliance with the requirements of the EU Conflict Minerals Regulation, we have requested our supplier to provide us with documentation of an audit carried out by a third party (pwc). We have attached the summary audit report to this report.
- If, in individual cases, we purchase from another supplier, we also clarify and document in advance that the requirements of the EU Regulation (2017/821) and the Dodd-Frank Act are met. Otherwise, purchasing is prohibited.

Supporting/accompanying documents at [www.westlakevinnolit.com](http://www.westlakevinnolit.com):

- Westlake/Westlake Vinnolit Code of Conduct
- EcoVadis Gold Ranking
- Sustainable Procurement Policy
- Declaration on Conflict Minerals
- Policy Statement on Respect for Human Rights

Please direct any questions or complaints to [cora.mitschka@westlake.com](mailto:cora.mitschka@westlake.com)

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Supply Chain Compliance

Appendix

## **Summary of the long-form report with limited assurance**

Minsur S.A. – Pisco smelting and refining plant

### **Scope and objective**

PwC Peru conducted a limited review of selected statements in Minsur's Responsible Mineral Sourcing Due Diligence Report for the Pisco Smelter and Refinery, covering the period from January 1, 2023, to June 30, 2024.

### **Criteria**

Assessment based on ITA and RMI standards: Assessment criteria for tin smelting companies (Version 2, March 2021).

### **Audit approach**

Conducted in accordance with ISAE 3000 (revised). Procedures included interviews, document reviews, CAHRAs assessment, risk matrix review, and site visit (August 13–14, 2024).

### **Key findings**

Conclusion: PwC is not aware of any circumstances that would lead it to believe that the identified statements made by Minsur are not in accordance with the criteria in all material respects.

### **Compliance with EU regulations**

Supports compliance with EU Regulation 2017/821 on due diligence for minerals from conflict-affected and high-risk areas.

### **Limitations**

The report is intended for the management and customers of Minsur S.A. for governance and compliance purposes.