



Electrolux Group Conflict Minerals Report

2024



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Abbreviations and definitions

Conflict Minerals Wolframite, or	Columbite-Tantalite (Coltan), Cassiterite, Gold, their derivatives
3TG	Tin, tantalum, tungsten, gold
CMRT	Conflict Minerals Reporting Template (for 3TG)
EMRT	Extended Minerals Reporting Template (for cobalt and mica)
DRC	Democratic Republic of the Congo
CAHRAs	Conflict-Affected and High-Risk areas. A broad and subjective category. See the indicative EU CAHRA List: https://www.cahraslist.net/
Covered Countries	Countries outlined in Section 1502 of the Dodd-Frank Act as those affected or bordering conflict-affected regions; currently defined as the Democratic Republic of the Congo and its nine adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia)
OECD	Organization for Economic Co-operation and Development
RCOI	Reasonable Country of Origin Inquiry
RMAP	Responsible Minerals Assurance Process
RMI	Responsible Minerals Initiative
SOR	Smelter or refiner: any company that procures and processes mineral ore, slag and/or materials from recycled or scrap sources into refined metal or metal containing intermediate products. The output can be pure (99.5% or greater) metals, powders, ingots, bars, grains, oxides or salts



Background and key results

This report describes the supply chain due diligence process for conflict minerals at AB Electrolux, and the results of the 2024 Conflict Minerals survey. Information in this report is based on the Group's supplier status in 2023. Throughout the report, data from the previous reporting year is presented in parentheses.

The Group implemented a policy regarding conflict minerals in the Electrolux Group Code of Conduct in 2014. The policy can now be found in the Electrolux Group Workplace Directive. In 2016, the Group voluntarily started a Conflict Minerals Due Diligence Program, based on the globally recognized framework from the Organization for Economic Co-operation and Development (OECD).

In 2024, Electrolux Group surveyed 210 (previous year: 222) of its first-tier suppliers in categories where it is expected that conflict minerals are present. Relevant supplier categories include providers of electrical and mechanical components, and Product Sourcing suppliers (OEM, Original Equipment Manufacturers).

A response rate of 84% (78%) was reached. The proportion of spend (in relevant product categories) of the respondents divided by the relevant spend of all suppliers in scope for the survey was 83% (88%).

Of the suppliers in scope, 75% (63%) indicated that they either had no 3TGs (see definitions) in products supplied to Electrolux Group, or that they do not have any SOR(s) that are potentially sourcing from the Covered Countries, and which are not RMAP conformant.

Sixteen (previous year: 27) of the surveyed suppliers reported high-risk smelters. Electrolux Group has approached these suppliers, and work is ongoing among several of them to eliminate these sources of material from their supply chain.

In 2024, Electrolux Group performed a study on 16 suppliers to understand their implementation of controls for the sourcing of cobalt and mica. Five suppliers reported Non-RMAP smelters, and four of these suppliers are reporting facilities designated as a CAHRA risk.



Executive summary

Conflict Minerals survey

The **Conflict Minerals Due Diligence Program** aims to improve transparency in the supply chain and mitigate potential risks. In 2024, Electrolux Group contacted **210 (222) first tier suppliers** for the reporting year 2023 and reached a **response rate of 84%** (78%). The spend with suppliers that responded divided by the spend with all suppliers in scope for the survey was **84%** (88%). Among the suppliers in scope, **75%** (63%) stated they either have no 3TGs in their products supplied to Electrolux Group or that they have no SOR(s) that are potentially sourcing from the Covered Countries, and which are not RMAP conformant.

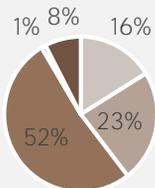
Potential high-risk suppliers

16 suppliers, representing 8% (12%) of the contacted suppliers in the Conflict Minerals survey, reported the potential use of non-conformant (related to the Covered Countries or the Middle East) gold smelters/refiners. Electrolux Group endeavors to encourage suppliers to adopt due diligence practices for the responsible sourcing of minerals. All potential high-risk suppliers have been contacted individually, and discussions with suppliers are ongoing (March 2025).

Cobalt and Mica survey

A study on the sourcing of cobalt and mica was performed in parallel. Thirteen of the 16 suppliers in scope responded. Five suppliers reported Non-RMAP smelters, and four of these suppliers are reporting facilities designated as a CAHRA risk.

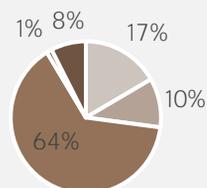
Conflict Minerals reporting, by number of suppliers



- No response: 16% (22%)
- No 3TG: 23% (20%)
- Conflict-free 3TG: 52% (43%)
- Incomplete: 1% (3%)
- High risk: 8% (12%)

Conflict Minerals reporting, by supplier spend

The total spend in the figure represents the spend of all suppliers in scope of the survey



- No response: 17% (12%)
- No 3TG: 10% (8%)
- Conflict-free 3TG: 64% (65%)
- Incomplete: 1% (4%)
- High risk: 8% (12%)



Introduction

A significant proportion of natural mineral resources are in the Covered Countries, currently defined as the Democratic Republic of the Congo (DRC) and its nine adjoining countries (Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia). The conflict minerals issue is directly or indirectly related to financing armed groups in this region. The trade of such minerals fuels local armed conflict, widespread violence or other risks of harm to people, which hinder economic, environmental and social development. The most lucrative minerals include tin, tantalum, tungsten and gold (3TG), and also cobalt and mica.

As defined in 2010 United States legislation, [Dodd-Frank Wall Street Reform and Consumer Protection Act](#), Section 1502(e)(4), the term “conflict mineral” means: columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country.

As per the [Dodd-Frank Act, Section 1502](#), companies quoted on the US Stock Exchange are required to report on the country of origin for conflict minerals coming from conflict-affected and high-risk areas. In May 2017, a similar law called the

[EU Conflict Minerals Regulation](#) was passed in the European Union. This law requires importers of 3TGs to report the presence and countries of origin of these minerals.

Electrolux Group is committed to sourcing responsibly and has implemented a Conflict Minerals Due Diligence Program. This program is essential to respond to consumer requirements and to fulfill existing and upcoming international legislations in this area.

Electrolux Group does not fall into the scope of the current legislation. However, the Conflict Minerals Due Diligence Program was implemented on a voluntary basis in 2016 and has been in place ever since. The Program is based on the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance. As part of this commitment, the Group has contacted its suppliers to understand their implementation level of the due diligence programs for the reporting year 2023, and to collect detailed information about the origin of 3TGs, cobalt and mica in the supply chain.



Electrolux Conflict Minerals Due Diligence Program

The Conflict Minerals Due Diligence Program at Electrolux Group has been implemented based on the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. The five main steps of the framework for the guidance and how Electrolux Group follows these steps are outlined below.

Step 1

Establish strong company management systems

- The [Electrolux Group Workplace Directive](#) includes clear statements regarding the Group's expectations of suppliers for the supply chain of conflict minerals:
- Suppliers are expected to ensure that the sourcing of conflict minerals in products, parts and components supplied to Electrolux Group does not directly or indirectly finance or benefit perpetrators of human rights abuses in conflict-affected or high-risk areas.
- Suppliers shall have in place policies and management systems, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas that are designed to accomplish the above.
- The Group's management system for the Conflict Minerals Due Diligence Program has been established by Group Function Technology, Digital and Sustainability with support from Global Purchasing, both dedicating resources for the development and monitoring of the program.
- The program focuses on surveying first tier suppliers and reporting the survey results. Detailed information and documentation related to the topic of conflict minerals is retained for a minimum of five years.
- Electrolux has a whistleblower reporting system which allows employees to voice grievances without fear of retaliation.

Step 2

Identify and assess risk in the supply chain

- Electrolux Group has identified the main risk in its mineral supply chain as the electrical industry. Therefore, first tier suppliers of electrical components and other risk categories such as thermostats, as well as original equipment manufacturers, are within the scope of the Conflict Minerals Due Diligence Program.
- Electrolux Group decided to contact and survey all large and medium-sized suppliers in each of these risk categories and to conduct a Reasonable Country of Origin Inquiry (RCOI) to determine whether any of the 3TG content originated from the conflict-affected or high-risk areas.



The survey was conducted using the Conflict Minerals Reporting Template (CMRT). Data collected from the CMRTs is compiled into an amalgamated smelter list by the third-party provider.

High-risk facilities are flagged to Electrolux Group by the third-party provider. High-risk facilities are defined as SORs sourcing source from the Covered Countries or one other area of high-concern and which are not RMAP Conformant.

[Responsible Minerals Initiative \(RMI\)](#), an organization that helps companies with tools and other resources to address the conflict minerals issue in the supply chain, has all the necessary information such as audit status of smelters or refiners (SORs), RCOI and human rights violation risks. As a member company, Electrolux Group has access to this information as an assessment tool for the results of the survey.

Step 3

Design and implement a strategy to respond to identified risks

- Results obtained from the survey of the Due Diligence Program are analyzed by the personnel responsible and reported to the Heads of Technology, Digital and Sustainability, and Global Purchasing.
- The main purpose of the survey and analysis is to map the risk among the Group's suppliers. Actions are being planned to respond to the identified risks.

Step 4

Carry out independent third-party audits of supply chain due diligence

- As a downstream company, Electrolux Group has no direct relationship with SORs as they are found several tiers below in the supply chain. As per OECD Guidelines, the Group co-funds independent third-party audits of SORs due diligence practices through industry programs.
- A third-party provider conducts annual outreach to smelters and refiners and encourages participation in the RMAP on behalf of Electrolux Group and its other clients.
- Electrolux Group partners with RMI and finances the Responsible Minerals Assurance Process (RMAP), an industry-wide certification program aimed at ensuring that business practices of SORs are not related to human rights abuses.

Step 5

Report annually on supply chain due diligence

- Electrolux Group reports on a voluntary basis and annually on the status of the Conflict Minerals Due Diligence Program. The results of the program are described in this report and are published on the Group's corporate website.

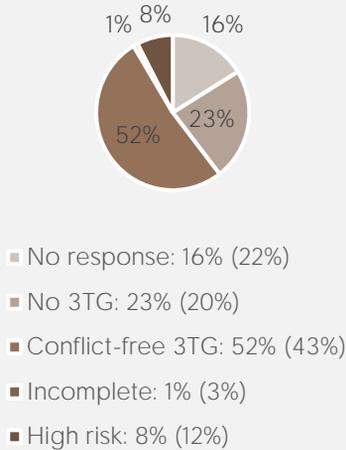


Survey results

Supplier status

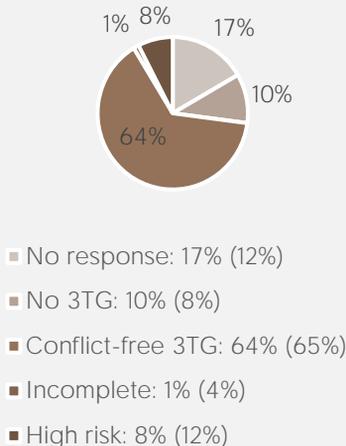
A total of 210 (222) first tier suppliers were identified as in-scope. Relevant supplier categories include providers of electrical and mechanical components, and Product Sourcing suppliers (OEM, Original Equipment Manufacturers). These suppliers were contacted and requested to complete and return the CMRT.

Conflict Minerals reporting, by number of suppliers



Conflict Minerals reporting, by supplier spend

The total spend in the figure represents the spend of all suppliers in scope of the survey



No response: Supplier did not respond to the Group's request to fill out the CMRT.

No 3TG: Supplier claimed they do not have 3TGs in their products supplied to Electrolux Group and has not listed any metal processors.

Conflict-free 3TG: All the metal processors listed by the supplier are known to be conflict-free for the declared metal(s), either because:

1. all processors are not within (or sourcing from within) the conflict-affected regions, or
2. because all processors in (or sourcing from within) the conflict-affected regions are certified conflict-free for the declared metal(s), or all processors are exclusive recyclers/scrap.

Incomplete: Supplier did not provide all the necessary information, and their risk status could not be determined. The most common reasons being the supplier declared 3TG in their products but did not provide any information on SOR, and supplier is associated with non-certified smelter pending certification.

High risk: Supplier has one or more SOR(s) that are potentially sourcing from the Covered Countries, and which are not RMAP conformant.

Note that SOR status is constantly changing and updated in the RMI database; SOR status is based on RMI data from the 27th of January 2025.



Cobalt and mica survey

Background

Cobalt is commonly used in lithium-ion batteries, enamel, and other applications and materials found in household appliances and many other products. The DRC is by far the world's leading cobalt producer, with over two thirds of the global production in 2022 (source: www.statista.com).

Mica is used in a wide variety of products. Sheet mica is used principally for its unique electrical and thermal properties. Micro-wave ovens and other appliances may contain mica. There are serious concerns associated with the cobalt artisanal mining operations in the DRC, and with the mining of mica, including unsafe working conditions, forced labor and child labor.

The cobalt and mica survey

Electrolux Group expanded its Conflict Minerals Program to include cobalt in 2020. The Cobalt survey is now an established part of the Electrolux Group Conflict Minerals process and report. From 2024, mica is also included in the survey. In 2024, 16 suppliers were in scope of the Cobalt/mica survey. 13 of those suppliers (81%) submitted the EMRT (Expanded Minerals Reporting Template, including cobalt and mica).

Five suppliers reported Non-RMAP smelters, and four of these suppliers are reporting facilities designated as a CAHRA risk. These suppliers have been contacted during the first quarter of 2025, and results will be followed up throughout the year.



Addressing Potential High-Risk Suppliers

Survey responses from 16 suppliers (8% of the contacted suppliers) indicated that they may have sourced gold from smelters or refiners that are not RMAP conformant or may source from the Covered Countries (see p. iii). RMAP conformance ensures that smelters or refiners have the management systems in place to source responsibly from conflict-affected areas.

The 16 suppliers were requested in December 2024-February 2025 to investigate their respective supply chains to determine, to the best of their abilities, whether any gold supplied by the non-conformant refinery(-ies) was obtained from any source associated with groups engaged in armed conflict in the Covered Countries. If this was found to be the case, the suppliers were requested to investigate whether any of that gold may have been used in the production of any materials that they supplied to Electrolux Group in 2023 or 2024.

If such connection to the materials supplied to Electrolux Group was confirmed, the suppliers were asked to do everything in their power to eliminate this source of material from their supply chain. In doing so, Electrolux Group asked the suppliers to engage with sub-suppliers to eliminate any High-Risk smelters or refiners from their supply chains.

Electrolux Group acknowledges that supply chains may be complex and not always fully transparent. We also understand that it may be challenging to obtain reliable information even if all stakeholders collaborate in good faith.

We will continue to engage with the concerned suppliers throughout 2025 and report the outcome in next year's Conflict Minerals report.

Follow-up of High-Risk suppliers from 2023

In the previous Conflict Minerals survey, 27 suppliers indicated that they may have sourced gold or other 3TGs from SORs that are identified as potentially High-Risk.

All 27 suppliers were contacted individually in November 2023 to January 2024, and several of them were contacted again in the spring. Some came back with updated CMRTs indicating no non-RMAP conformant SORs. However, later in 2024, several of these suppliers provided CMRTs for the current report with non-RMAP conformant SORs.

This is the status of last year's 27 high-risk suppliers (as of March 2025):

- *Updated CMRTs indicating no use of non-conformant SORs (12 suppliers)*
- *Still including non-conformant SORs (10 suppliers).*
- *Supplier phased out (5 suppliers)*

Decreasing number of potentially high-risk suppliers

This year, Electrolux Group observed a decrease in suppliers reporting high-risk smelters in their supply chains, compared to the previous year. Contributing factors to this may include:

- Successful follow-up of previous High-Risk suppliers
Electrolux Group actively encourages its suppliers in scope to investigate to the best of their ability, together with their sub-suppliers further down the supply chain, and to eliminate high-risk SORs. As mentioned above, 12 suppliers from previous year's survey provided updated CMRTs or similar evidence to demonstrate a conflict-free supply chain vis-à-vis Electrolux Group.
- Supplier consolidation
Electrolux Group continuously revises and develops its supply chain. Since the previous survey, five suppliers that reported high-risk SORs have been phased out.
- Increasing awareness
Conflict Minerals programs have been in place for over ten years, and supplier awareness has increased over time, resulting in a decreased number of suppliers having high-risk SORs.
- Modified scope of program
In this year's report, and in coming reports, the category IT Hardware Suppliers will not be included. Some of the suppliers in that category reported high-risk SORs.

Case:

Revisiting a Global Electronic Manufacturing Services supplier

In last year's report, we presented a multinational supplier of electronic products. This supplier had gone to great length to eliminate from its very complex supply chain non-conformant smelters. Those efforts continued throughout this year. However, just like last year and despite successful efforts to remove non-conformant SORs from the supply chain, this was not successful for a limited number of articles. Thus, in spite of significant improvements, this supplier is still in our records as a High-risk supplier. This illustrates the difficulty to fully eliminate non-conformant smelters in the supply chain.

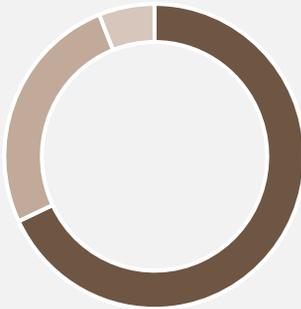


Reporting scope

The Conflict Minerals and Cobalt Due Diligence Program at Electrolux has been implemented on a voluntary basis. Therefore, suppliers are free to declare the information they want to declare. Furthermore, Electrolux Group gives suppliers the ability to share information in the CMRT/EMRT at a level with which they are most comfortable: company level, product level or user-defined. However, the declaration scope had to be specified in the CMRT/EMRT.

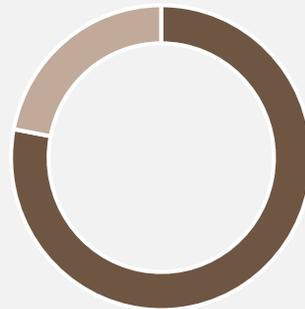
Among the suppliers that reported non-conformant 3TG SORs, 69% reported at a company level. Therefore, it is possible that reported non-conformant SORs were not related to products sold to Electrolux Group.

Conflict Minerals



- Company level 68% (69%)
- Product level 26% (23%)
- User-defined 6% (8%)

Cobalt / mica



- Company level 78% (87%)
- Product level 22% (13%)
- User-defined 0% (0%)

Company level: The supplier's declaration encompasses the entirety of their company's products or product substances produced by the parent company. Therefore, if a supplier reported 3TG/Cobalt data at the company level, they had to report conflict minerals/cobalt data on all products they manufacture.

Product level: The supplier chose to report 3TG/cobalt data at the product level and was required to list the manufacturer's quantity of the products that they declared.

User-defined: The supplier was required to describe the scope to which the 3TG/cobalt disclosure is applicable. Scope of this class was defined in a text field by the supplier and had to be easily understood by customers or the receivers of the document. As an example, suppliers could provide a link to clarifying information.



Quality assurance

Supplier responses were evaluated for plausibility, consistency and gaps by the Group's third-party service provider. If any of the following quality control (QC) flags were raised, suppliers were contacted by the service provider:

- One or more SOR(s) were listed for an unused metal;
- SOR information was not provided for a used metal, or SOR information provided was not a verified metal processor;
- Supplier indicated that they have not received conflict minerals data for each metal from all relevant suppliers;
- Supplier indicated they have not identified all the SORs used for the products included in the declaration scope;
- Supplier indicated they have not provided all applicable SOR information received;
- Supplier's indication that their products do not contain 3TGs is found to be unreasonable;
- Supplier provided unacceptable file format (ex: PDF or outdated template version);
- Supplier provided other documentation in place of a CMRT (ex: statement or policy);
- Supplier did not complete all the required fields within the CMRT.



SOR status, Conflict Minerals, Cobalt and Mica

A total of 586 (previous year: 515) 3TG SORs, and 83 (79) Cobalt and Mica SORs have been reported by the suppliers.

244 (168) of the reported CMRT SORs and 7 (3) EMRT SORs have been determined to be either unknown, inactive, non-processors or removed, according to the definitions in the box. SORs that meet any of those criteria were determined out of scope for this report and have therefore been eliminated from further investigation.

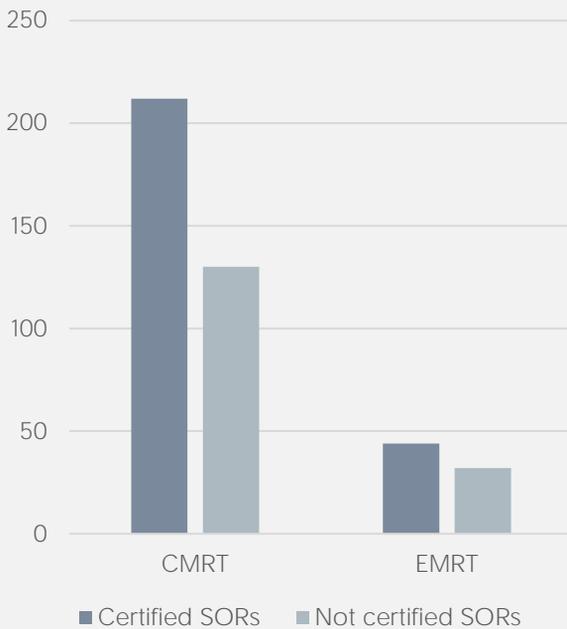
Unknown: SOR has not been officially identified by RMI or through third-party research.

Inactive: Third-party vendor has determined through outreach or research that the entity no longer meets the definition of a SOR.

Non-processor: Any company that does not smelt, refine, or exclusively recycle 3TG. Examples include manufacturers, distributors, metal plating companies, soldering and welding companies.

Removed: SOR was listed on the CMRT Smelter Reference List, but the RMI has determined that the smelter no longer meets the definition of a SOR.

The remaining 342 CMRT and 76 EMRT in-scope SORs have been categorized based on their verification and certification status. Of the in-scope SORs, 212 of the CMRT SORs (62%) and 44 of the EMRT SORs (58%) are certified.



Known and certified:
SOR is both identified by RMI and certified by the London Bullion Market Authority LBMA, the Responsible Jewellery Council RJC, and/or RMAP as "DRC conflict-free"

Known but not certified:
SOR is identified by RMI but not certified by LBMA, RJC, and/or RMAP due to incomplete or not yet commenced auditing process. SORs seek certification regardless of their location to prove their ethical sourcing activities.



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For more detail and comprehensive performance data, please see
the Sustainability statement in our Annual report:
[electrolux-Annual-Report-2024-250220.pdf](#)