

# KION

Report RMY 2025

## Due Diligence Report For Conflict Minerals and Extended Minerals



**Supplier Sustainability**  
(Global Procurement Functions)

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## 1. Terms and definitions

<b>3TG´s</b>	Tin, Tungsten, Tantalum, their ores and/or Gold
<b>ASM</b>	Assent Sustainability Management (SAAS Platform)
<b>CAHRAs</b>	Conflict-Affected and High-Risk areas which includes the Covered Countries.
<b>Conflict Minerals</b>	Mean the raw minerals <b>tin, tungsten, tantalum, their ores and/or gold</b> (3TG´s) as defined by the OECD Due Diligence Guidance.
<b>Conflict Minerals “RM Smelter Validation Report RY2025”</b>	<a href="#">CM Smelter Validation Report RY2025</a> , this report is provided by Assent at the end of the RMY.
<b>County of Origin</b>	Means the <b>country in which the mineral ore was mined</b> before any processing or smelting as defined under section 1502 of the U.S. Dodd-Frank Act and as CAHRAs as defined in the OECD Due Diligence Guidance.
<b>Covered Countries</b>	Means the Democratic Republic of the Congo (DRC) and/ or an adjoining country as defined under section 1502 of the U.S. Dodd-Frank Act and as CAHRAs as defined in the OECD Due Diligence Guidance.
<b>CM</b>	<b>Conflict Minerals</b>
<b>CMRT</b>	<b>Conflict Minerals Reporting Template</b>
<b>DRC</b>	<b>Democratic Republic of the Congo</b>
<b>EMRT</b>	<b>Extended Minerals Reporting Template</b>
<b>EPR</b>	<b>Environmental Product Requirements</b>
<b>Extended Minerals</b>	Mean the raw minerals <b>Cobalt, Mica, Copper, natural Graphite, nickel and/or Lithium</b> , as defined by the Responsible Minerals Initiative (RMI), an industry initiative implementing the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
<b>Extended Minerals Smelter Validation Report RY2025</b>	<a href="#">Extended Minerals Smelter Validation Report RY2025</a> , this report is provided by Assent at the end of the RMY.
<b>OECD</b>	<b>Organization for Economic Co-operation and Development</b>
<b>OECD Due Diligence Guidance</b>	The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas is an international framework that helps companies identify, prevent, and mitigate risks of contributing to conflict, human rights abuses, or unethical practices in mineral supply chains through a structured due-diligence process. <a href="#">OECD Due Diligence Guidance</a>
<b>Raw Materials</b>	In respect of this document means raw minerals that could be categorized as Conflict Minerals (Tin, Tungsten, Tantalum, their ores and/or Gold) and/ or Extended Minerals (Cobalt, Mica, Copper, natural Graphite, nickel and/or Lithium).
<b>RM</b>	<b>Responsible Minerals</b>
<b>RMI</b>	<b>Responsible Minerals Initiative</b>

<b>RMAP</b>	The <b>Responsible Minerals Assurance Process</b> is RMI's independent audit program that evaluates smelter/refinery management systems and sourcing practices via third-party assessments to verify adherence to responsible sourcing criteria.
<b>RMS</b>	<b>Responsible Minerals Sourcing</b>
<b>RMS Due Diligence (KION)</b>	Means, KION's own responsible minerals sourcing due diligence process as defined by the <a href="#">Responsible Minerals Sourcing Standard</a>
<b>RMY / RY</b>	<b>Responsible Minerals Year / Responsible Year</b> (running from May to May (but campaign starts in Oct. und ends in May), yearly basis)
<b>RMSC</b>	<b>Responsible Minerals Sourcing Committee</b>
<b>SaaS</b>	<b>software-as-a-service</b>
<b>SuSu</b>	<b>Supplier Sustainability Team of KION Global Procurement</b>
<b>SoR</b>	<b>Smelter or Refiner</b>

## 2. Company Overview

This report has been prepared by Global Procurement Functions – Supplier Sustainability (SuSu) of KION GROUP AG. The information includes the activities of all material subsidiaries that are required to be consolidated. This includes the brands:



## 3. Introduction

KION has been systematically collecting data on material compliance matters from its suppliers since 2022. This includes particularly due diligence checks in its supply chain in order to ascertain whether the goods and components that it procures from its suppliers, and that are used within KION's end products, potentially contain conflict minerals.

In 2025 KION replaced its existing Conflict Minerals Standard by the extended and updated Responsible Minerals Sourcing Standard. The new standard is based on the OECD Due Diligence and other pertinent policies and regulations, such as the EU Conflict Minerals Regulation (Regulation (EU) 2017/821) and the US Dodd-Frank Act (section 1502). Unlike the previous Conflict Minerals Standard, the new standard also relates to other relevant minerals. The standard promotes responsible procurement and a zero-tolerance policy toward child labor, forced labor, human trafficking, and precarious employment. The extraction of minerals, in particular, poses an elevated risk of human rights violations around the world.

Global Procurement is the central function with responsibility for managing and overseeing these checks. The standard is available to the public on the KION's website at [www.kiongroup.com/en/About-us/Suppliers](http://www.kiongroup.com/en/About-us/Suppliers).

For the execution of the related RMS Due Diligence, KION has established further processes and traceability mechanisms to identify the origin of these minerals, which may refer to the country or the specific mine from which these minerals originated. For the collection and management of this information throughout the upstream supply chain, **KION works with the external service provider Assent**, which supports supplier engagement and the gathering of relevant mineral origin data via the CMRT or EMRT Template.

## 4. KION 's Responsible Minerals Due Diligence Process

Since 2018, KION has worked closely with customers and suppliers to promote responsible sourcing and reduce the use of conflict minerals.

### 4.1 Supplier's commitment

All suppliers entering into a business relationship within KION must agree to the [Supplier Code of Conduct](#) – either by acknowledging the [General Terms and conditions of Purchase](#) or by concluding an individually negotiated agreement. The Supplier Code of Conduct (Version 3, June 2025) obliges the supplier to conduct the sourcing of minerals from Conflict-affected and high-risk areas in accordance with the OECD Due Diligence guideline or an equivalent and recognized due diligence framework. In addition to Extended Minerals as well suppliers must follow the OECD Due Diligence Guidelines and Ten Principles of the United Nations Global Compact when supplying or dealing with these materials.

In addition, both the General Terms and Conditions of Purchase of KION and individual agreements contain further requirements and obligations for the supplier to comply with applicable laws and regulation and to ensure that social and environmental rights abuses are avoided.

Non-compliance with this commitment or violation of these requirements, including rejection of mitigation measures, may give rise to legal action and may lead KION to finally terminate the business relationship.

### 4.2 KION Due Diligence process

Although KION is neither directly purchasing those Raw Minerals, nor is directly involved or supports any activity to move the Raw Mineral from the extraction site downstream to its incorporation in the final product for end consumers, KION understands that the associated environmental, social, labour or human risks with the Raw Minerals could be part of its supply chain. Therefore, KION will conduct RMS Due Diligence to ensure compliant and responsible procurement of goods and service throughout its supply chain and allow the traceability of the Raw Minerals to their origin.

The [Responsible-Minerals-Sourcing-Standard](#) determines and defines the internal processes and roles within KION for the Due Diligence process to ensure a continuous and effective process.

Within the described process of the RMS Standard (section 4.2), a Responsible Minerals Sourcing Committee (RMSC) was established. The RMSC consists of representatives from Compliance, Legal, Sustainability, Procurement, Human Resources, and other relevant functions. It oversees and monitors the effectiveness of the due diligence process, facilitates discussions of the results, determines any necessary corrective actions, and approves the final report. By systematically overseeing the Due Diligence activities, discussing outcomes, and making informed decisions on corrective actions, the RMSC aims to enhance compliance, mitigate risks, and ensure that all due diligence efforts align with the organization's strategic objectives.

KION has also established a grievance/ whistleblower process ([LINK](#)) where violations of human rights or serious environmental concerns in the supply chain, including Raw Minerals, can be reported, particularly breaches covered by the German Supply Chain Due Diligence Act. These include issues such as child and forced labour, discrimination, unfair wages, restrictions on freedom of association, unsafe working conditions, unlawful land confiscation, environmental pollution, and violations related to international conventions on hazardous substances and waste.

## 5. Traceability Mechanism and Risk Assessment of the Conflict Minerals and Extended Minerals Campaign

To determine whether Conflict Minerals and/ or Extended Minerals originate from Conflict-Affected and High-Risk Areas, KION uses the service provider Assent to support the upstream supply chain due diligence and risk identification. For this KION provides Assent with a list of relevant Tier1 Series suppliers and parts, and suppliers are surveyed using the Conflict Minerals Reporting Template (CMRT v6.5 or higher) and/or the Extended Minerals Reporting Template (EMRT v2.0 or higher).

The annual Assent campaign typically runs from September to May, aligning with the Responsible Minerals Initiative (RMI) reporting cycle. KION suppliers submit their CMRTs/EMRTs via the Assent Compliance Manager platform, which manages supplier communication, validates submissions, and evaluates the quality of responses based on OECD Due Diligence Guidance requirements:

- Submitted templates are automatically validated to detect errors or inconsistencies (see [Appendix A: Assent Declaration Rejection/Approval Criteria](#)) by Assent. Suppliers with invalid submissions are contacted and supported in correcting and resubmitting their data. Since some suppliers may remain unresponsive to feedback, KION tracks program gaps to account for future improvement opportunities (refers to EPR Process [/EPR Supplier Transparency Risk](#)). This approach also applies to the Extended Minerals (EMRT).
- Assent compares reported smelters and refiners (see [Appendix B: Assent Smelter Validation logic](#)) with the RMI Smelter Reference List (Third-Party: RMAP by RMI) to determine their audit status (compliant, active, non-conformant or not enrolled) and assess the potential supply chain risks, such as Geo Risk (Proximity Risk), Peer-Assessment Status and Sourcing Risk (unethical or conflict -). KION relies on the Responsible Minerals Initiative (RMI) list, which is based on verified independent third-party audit programs.

The assessed risk is classified as **Low** (no potential risk of Conflict-Affected and High-Risk affected areas for the defined Conflict Minerals and Extended Minerals), **Medium** (some potential risk of

Conflict-Affected and High-Risk affected areas for the defined Conflict Minerals and Extended Minerals), or **High** (potential risk of Conflict-Affected and High-Risk affected areas for the defined Conflict Minerals and Extended Minerals), based on a scoring algorithm embedded in the Assent platform. Where potential risks are identified, suppliers may be required to provide updated information, perform additional due diligence, or transition sourcing to RMAP-conformant smelters. Assessment results are monitored and used for compliance reporting and ongoing risk management in accordance with the OECD Due Diligence Guidance.

Assent also provides training and support to help suppliers complete the templates.

## 6. KION ´s Participation in the Conflict Minerals Smelter Outreach Campaign (Initiative)

Since 2022, KION has participated in an annual smelter outreach initiative for Conflict Mineral smelters and refiners (SoR). This initiative, which is actively managed by the service provider Assent, aims to approach directly those SoRs that have not yet been, or have refused to be, assessed by local auditors regarding their conflict-free minerals sourcing. The initiative does not specifically target KION suppliers but is a general due diligence initiative as part of an industry-recognized assessment program, with the objective of improving transparency globally. KION initiated an additional campaign in 2025 to increase the scope of the supplier information that it holds.

The aim of the additional campaign for Conflict Minerals is to ensure that Assent’s clients’ responsible minerals programs align with the [OECD Due Diligence Guidance](#) (Annex I, Step 3 – Design) and implement a strategy to identify and manage risks by communicating identified gaps and risks within the upstream supply chain.

Through collaborative outreach letters, Assent and participating companies (>100) encourage smelters and refiners to participate in recognized Third-party audit programs such as the RMI’s Responsible Minerals Assurance Process (RMAP). This collective approach increases industry pressure for responsible sourcing and helps companies validate materials in their supply chains.

The initiative includes engaging smelters, collecting and verifying data, assessing and mitigating risks, and monitoring progress. Assent is not performing another smelter outreach campaign for Extended Minerals but has nonetheless provided the Extended Minerals Smelter Validation Report.

After the campaign, Assent provides KION with a ‘[CM Smelter Validation Report RY2025](#)’ and ‘[Extended Minerals Smelter Validation Report RY2025](#)’ summarizing smelter analysis and relevant data.

## 7. Mitigation steps / Next steps

In line with the [Responsible Minerals Sourcing Standard](#) (section 5) the detailed results of the conducted and final Due Diligence process and Risk Assessment will be provided to the RMSC. Based on the results the RMSC will determine and approve risk-management plans, such as corrective actions, if necessary, review and approve the required Due Diligence reports and ensure that all due diligence activities align with the organization’s strategic objectives.

Additionally, the results will be incorporated into the Tier-N mapping of the Human- and Environmental Rights Due Diligence process, which is currently under development. Risk mitigation will be coordinated centrally across all direct suppliers and Tier-N suppliers of KION.

## **8. Sources / References**

[Assent\\_Best Practice Sample RMY 2025](#)

[Assent\\_Guide-Preparing-a-Conflict-Mineral-Report-CM](#)

[Assent\\_Conflict Minerals Process Booklet 2026](#)

[Assent\\_Guide Smelters of Interest 2026](#)

[OECD Due Diligence Guidance for responsible Supply Chains](#)

## 9. Results 2025

### 9.1 RMY 2025 reflecting Conflict Minerals

		<b>RMY 2025</b> Final status as of 1 <sup>st</sup> June 2026	<b>RMY 2024</b> Final status as of 3 <sup>rd</sup> / 5 <sup>th</sup> June 2025
<b>CM Supplier Campaign (generic values)</b>	<b>Suppliers in Scope</b> (All suppliers in scope for the Assent-Module "Conflict Minerals")	1,949	1,233
	<b>KION KPI Target</b> (Target based on the highest response rate per previous year)	60%	60%
	<b>Response Rate</b> (Includes status "completed", "unfinished" and "invalid CMRT")	57%	58%
<b>CM Smelter Outreach Campaign (Initiative)</b>	<b>Smelters with Audit Status Conformant</b> (RMAP Audit Status)	62% (count of Conformant Smelters: 211)	63% (count of Conformant Smelters: 233)
	<b>Final Smelter Risk – Assent´s Rating</b> (Risk scoring methodology (Geo Risk, Audit-related Risk, Peer-Assessment and Sourcing Risk) performed by Assent to determine the overall risk of a Smelter or Refiner)	High Risk: 10% Medium Risk: 38% Low Risk: 51% (count of verified SORs: 341)	High Risk: 11% Medium Risk: 43% Low Risk: 46% (count of verified SORs: 372)

CM Supplier Campaign (generic values) = values taken from internal file '[KPI internal\\_EPR consolidated list ongoing time period.xlsx](#)'.  
CM Smelter Outreach Campaign (Initiative) = values taken from Conflict Minerals Smelter Validation Report, RMY 2024 and RMY 2025.

### 9.2 RMY 2025 reflecting Extended Minerals

		<b>RMY 2025</b> Final status as of 18 <sup>th</sup> / 19 <sup>th</sup> May 2026	<b>RMY 2024</b> (The Extended Minerals Module was newly implemented in 10/2025)
<b>Extended Minerals Supplier Campaign (generic values)</b>	<b>Suppliers in Scope</b> (All suppliers in scope for the Assent-Module "Extended Minerals")	2,017	Not available
	<b>KION KPI Target</b> (Target based on the highest response rate per previous year)	40%	Not available
	<b>Response Rate</b> (Includes status "completed", "unfinished" and "invalid EMRT")	40%	Not available
<b>Extended Minerals Smelter Validation Report</b> (alternative evaluation method, since no smelter outreach campaign (initiative) for the Extended Minerals will be performed via Assent, but the assessment is similar to Conflict Minerals.)	<b>Smelters with Audit Status Conformant</b> (RMAP Audit Status)	58% (count of Conformant Smelters: 183)	Not available
	<b>Final Smelter Risk – Assent´s Rating</b> (Risk scoring methodology (Geo Risk, Audit-related Risk, Peer-Assessment and Sourcing Risk) performed by Assent to determine the overall risk of a Smelter or Refiner)	High Risk: 6% Medium Risk: 33% Low Risk: 61% (count of verified smelters: 317)	Not available

Extended Minerals Supplier Campaign (generic values) = values taken from internal file '[KPI internal\\_EPR consolidated list ongoing time period.xlsx](#)'.  
Extended Minerals Smelter Report = Values taken from Extended Minerals Smelters Validation Report RY2025.

## 10. Conclusion for Conflict Minerals and Extended Minerals

For Responsible Minerals Year (RMY) 2025, the final status as of 1<sup>st</sup> June 2026 show notable changes compared with RMY 2024 (final status as of 3 June 2025).

The number of suppliers in scope for the Conflict Minerals (CM) supplier campaign increased significantly to 1,949, compared with 1,233 suppliers in 2024, indicating a considerable expansion of the supplier base assessed. The KION KPI target response rate remained unchanged at 60% for both years. However, the response rate in 2025 reached 57%, slightly below both the KPI target and the 58% response rate recorded in 2024.

In the CM Smelter Outreach Campaign, the share of smelters with a conformant RMAP audit status declined slightly from 63% (233 smelters) in 2024 to 62% (211 smelters) in 2025.

Regarding the final smelter risk assessment conducted by Assent, 341 smelters or refiners (SORs) were verified in 2025, compared with 372 in 2024. The risk distribution improved slightly in 2025, with 10% high risk, 38% medium risk, and 51% low risk, compared with 11% high risk, 43% medium risk, and 46% low risk in 2024.

Overall, while the number of suppliers in scope increased substantially and the number of verified smelters decreased slightly, the share of low-risk smelters improved in 2025, indicating a modest improvement in the overall smelter risk profile compared with the previous year.

The Extended Minerals Module was newly implemented in October 2025; therefore, RMY 2025 represents the first reporting cycle and no comparison with a previous year is available.

As of the final status on 18/19 May 2026, a total of 2,017 suppliers were identified as in scope for the Extended Minerals supplier campaign within the Assent platform. The KION KPI target response rate was set at 40%, based on the highest response rate achieved in previous years for similar campaigns. The final response rate also reached 40%, meeting the defined KPI target.

Assent is not performing another smelter outreach campaign for Extended Minerals but has nonetheless provided the Extended Minerals Smelter Validation Report. According to this assessment, 58% of smelters (183) have a conformant RMAP audit status.

Assent's smelter risk scoring methodology, which considers geo-risk, audit-related risk, peer assessment, and sourcing risk, was applied to 317 verified smelters. The resulting risk distribution shows 6% classified as high risk, 33% as medium risk, and 61% as low risk.

Overall, the first campaign under the Extended Minerals Module shows a response rate which meets the defined KPI target and provides an initial risk overview of suppliers and smelters within the extended mineral supply chain.

## Appendix A: Assent Declaration Rejection/Approval Criteria

### Assent Sustainability Platform Logic Structure

The following tables map the Assent Sustainability Platform's status outputs and CMRT logic structure when determining supplier conflict mineral statuses as displayed on the dashboard. Using this table, and referencing the CMRT questions listed above, users will be able to determine what answers were provided by their suppliers to earn their conflict minerals statuses (Assent\_Conflict Minerals Process Booklet\_2026, page 31).

Same logic applicable to EMRT.

Supplier Status	Description
<b>Not Submitted</b>	No CMRT has been provided by the supplier.
<b>Complete</b>	A CMRT has been submitted and is valid and complete
<b>Incomplete</b>	A supplier with parts associated to them has submitted a partially completed Product-Level or User-Defined CMRT
<b>Invalid Submission</b>	A CMRT has been submitted and deemed invalid based on contradicting responses in the template

Source: [Assent\\_Conflict Minerals Process Booklet\\_2026](#)

## Appendix B: Assent Smelter Validation logic

All CMRTs are classified based on risk associated with the smelter information provided. Individual smelters in the Assent Smelter Database are assigned a risk based on factors essential to proper risk evaluation under OECD Guidelines. The risk is deemed as Low, Medium, or High and is determined via a scoring algorithm embedded in the Assent platform.

The Risk Rating is based on three factors ([Assent Conflict Minerals Process Booklet 2026](#), page 20 and [Assent Guide Smelters of Interest 2026](#), page 8):

Status	Description
<b>Geo Risk (Proximity Risk)</b>	Geo Risk considers whether the minerals originated from, or were transited through, a conflict-affected or high-risk area, such as the Democratic Republic of the Congo (DRC) and its nine adjoining countries. <sup>1</sup>
<b>RMI Audit Status</b>	Audits help ensure that sourcing practices align with the OECD Due Diligence Guidance. It considers participation in programs such as Responsible Minerals Assurance Process (RMAP) audits, or a cross-recognized initiative. <sup>2</sup> These programs help determine which smelters and refiners can validate their sourcing as conflict-free or responsibly sourced. → compliant, active, non-conformant or not enrolled
<b>Peer-Assessment</b>	Data from public filings provides valuable information on the smelter assessments conducted by credible third-party sources. These assessments may indicate red flags, as defined by the OECD Due Diligence Guidance. <sup>3</sup>
<b>Sourcing Risk</b>	Sourcing risk evaluates evidence of any area of concern (e.g., ESG-related issues) supported by credible sources and denied parties lists (sanctions). → unethical or conflict sourcing, or potential sanction issue

Source: [Assent Conflict Minerals Process Booklet 2026](#); [Assent Guide Smelters of Interest CM](#)

<sup>1</sup>Securities and Exchange Commission. (2012). Final Rule: Conflict Minerals. <https://www.sec.gov/rules/final/2012/34-67716.pdf>

<sup>2</sup>Responsible Minerals Initiative. (n.d.). Responsible Minerals Assurance Process. <http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/>

<sup>3</sup>U.S. Securities and Exchange Commission. (n.d.). EDGAR Company Filings. <https://www.sec.gov/edgar/searchedgar/companysearch.html>