

Conflict Minerals Report

For the reporting Period: January 1, 2025 to December 31, 2025

A. Overview

SPRO N.V. is a wholesales company that trades in all kinds of fishing tackle. We manufacture or contract to manufacture a variety of fishing tackle equipment. We have determined that our product range partially falls under the regulation for conflict minerals (EU 2017/821) namely with products of Tungsten.

Therefore we have conducted, in good faith, a country of origin inquiry with our suppliers that was done to determine whether any conflict minerals in our products originated in areas that are mentioned as “Conflict-affected and high-risk area’s”. Based on this investigation we had no reason to believe that in calendar year 2025 necessary conflict minerals contained in our products may have originated in the covered countries.

B. Design of Conflict Minerals Program

We designed our conflict minerals program to conform all material respects with the internationally recognized due diligence framework developed by The Organisation for Economic Co-operation and Development (OECD), OECD (2016), *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: Third Edition*, OECD Publishing, Paris.

<http://dx.doi.org/10.1787/9789264252479-en>

Our conflict minerals program was designed to address each of the five steps in OECD Guidance due diligence framework as they relate to our position as a downstream purchaser in the conflict minerals supply chain namely;

- Establish strong company management systems
- Identify and assess risk in the supply chain
- Design and implement a strategy to respond to identified risks
- Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain
- Report on supply chain due diligence

Because we are a downstream supplier, we are many steps removed from the mining of conflict minerals. The components and materials contained in our products are supplied by three suppliers, through multiple tiers of distribution. Once minerals are in

the supply chain, determining the smelter or the origin of minerals is a challenging process, and we are realistic about the limitations on what we can identify and control.

Establish strong company management systems

We have established an internal conflict minerals program to manage risks in our supply chain through policies and procedures that are designed to help us understand whether the minerals in our products contribute to any conflicted area's. As part of our program, we have established and maintain company management systems that involve multiple levels of our organization.

As company policy we have implemented a system that requires our suppliers in tungsten products to comply with the OECD standards mentioned in Annex II of the OECD guidance for conflict minerals. Herewith a procedure to ensure possible risks are adequately managed.

In addition to the company management systems described above, we have also implemented the following company management controls:

- We provide our Statement on conflict minerals to all of our relevant suppliers that supply relevant components and materials to us and communicate to them our expectations as to our supply chain and the responsible sourcing of conflict minerals

- We have adopted internal procedures with respect to conflict minerals into our quality management system

- We have established and maintain a central repository of information to facilitate analysis and identification of supplier responses received from our supply chain due diligence

Identification and assessment of supply chain risk

We have developed and implemented a risk management plan to identify and assess risks in our supply chain. To identify and assess these risks, we identify all of our tungsten suppliers and conduct an annual supply chain survey of our tungsten suppliers.

To maximize the effectiveness of our due diligence measures, we concentrate our due diligence efforts primarily on those tungsten suppliers representing a substantial majority of our total annual expenditure on relevant components and materials.

Factors we take into account in identifying and assessing supplier risk include:

- The failure of a supplier to respond to our inquiries
- Statements by a supplier that no conflict minerals are used in its products
- Inadequacies and inconsistencies in, or incompleteness of, a supplier's responses
- Suppliers that indicate conflict minerals in their products may be sourced from covered countries
- A supplier's lack of sophistication, including unfamiliarity with the legislation

Designing and implementing a strategy to respond to risk

We have developed processes to assess and respond to the risks identified in our supply chain. Our cross-functional Trading team manages the due diligence of our supply chain, and monitors, tracks and evaluates supplier responses to our due diligence efforts. Members of our cross-functional trading team meet periodically to review the status and results of our due diligence measures and to discuss any actual or potential risks and red flags identified during diligence. Members of our cross-functional trading team also monitor and track the measures we take to mitigate risks, and reports on risk management to our management board.

Independent third-party audits of smelters and refiners

We do not have direct relationships with any smelters or refiners and accordingly do not directly audit any smelters or refiners in our supply chain. Instead, we rely on the third-party audits of smelters and refiners conducted as part of the RMI website. The smelters and refiners that are found by the RMI compliant smelter list to be "compliant" are those for which the independent auditor has verified that the smelter and/or refiner does not process conflict minerals that have originated from mines in the Covered Countries that directly or indirectly financed or benefited armed groups.

Public reporting on our supply chain due diligence

We share our conflict-minerals report on our website <https://spro.eu/declaration-of-conformity/>

C. Due diligence measures performed

Set forth below is a description of the measures we performed to exercise due diligence on the source and chain of custody of the necessary conflict minerals contained in our products.

To determine whether necessary conflict minerals in our products in calendar year 2025 originated in covered countries, we assembled a comprehensive list of suppliers that provide goods directly to us. From this list, we identified 3 suppliers with tungsten supplies. We contacted all of these suppliers that require import declarations individually, provided them with our statement on conflict minerals and a CMRT form, and requested the return of the completed CMRT form to us. One new supplier we started working with is yet to complete everything. Willingness to be compliant is there for this new supplier, so we are confident this will be a good start. Follow-up requests were sent to 1 supplier who did not respond and ultimately is unable to supply the correct information from he's supplier which makes us take measures and relocate the products to another supplier. To maximize the effectiveness of our due diligence measures, we concentrate our due diligence efforts primarily on tungsten suppliers. We used our manufacturing data system to identify tungsten suppliers, and took additional measures to maximize the response rate from tungsten suppliers. We received responses from all of our tungsten suppliers.

We electronically aggregated and reviewed the data from all of the responses we received from our tungsten suppliers. We applied our evaluation processes to data received to assess the reasonableness of the data and to check for the presence of "red flags." Where red flags were identified, we undertook further analysis of the information provided on the CMRT form and e-mails in order to assess any actual or potential risks to our supply chain and develop a recommended course of action.

D. Product description

Products containing necessary conflict minerals

We have determined that substantially the following products we manufacture or contract to manufacture contain conflict minerals necessary to the functionality or

| Article | Description |
|--------------|---------------------------------|
| STGPES1 | TUNGSTEN PEA SINKER 1oz |
| STGPES1/2 | TUNGSTEN PEA SINKER 1/2oz |
| STGPES1/2BLK | TUNGSTEN PEA SINKER BLACK 1/2oz |
| STGPES1/4 | TUNGSTEN PEA SINKER 1/4oz |
| STGPES1/4BLK | TUNGSTEN PEA SINKER BLACK 1/4oz |
| STGPES1/8 | TUNGSTEN PEA SINKER 1/8oz |
| STGPES1/8BLK | TUNGSTEN PEA SINKER BLACK 1/8oz |

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| STGPES11/2 | TUNGSTEN PEA SINKER 1 1/2oz |
| STGPES11/2BLK | TUNGSTEN PEA SINKER BLACK 1 1/2oz |
| STGPES1BLK | TUNGSTEN PEA SINKER BLACK 1oz |
| STGPES2 | TUNGSTEN PEA SINKER 2oz |
| STGPES2BLK | TUNGSTEN PEA SINKER BLACK 2oz |
| STGPES3/16 | TUNGSTEN PEA SINKER 3/16oz |
| STGPES3/16BLK | TUNGSTEN PEA SINKER BLACK 3/16oz |
| STGPES3/4 | TUNGSTEN PEA SINKER 3/4oz |
| STGPES3/4BLK | TUNGSTEN PEA SINKER BLACK 3/4oz |
| STGPES3/8 | TUNGSTEN PEA SINKER 3/8oz |
| STGPES3/8BLK | TUNGSTEN PEA SINKER BLACK 3/8oz |
| STGSLD1/16 | TUNGSTEN SLIDE SINKER 1/16oz |
| STGSLD1/8 | TUNGSTEN SLIDE SINKER 1/8oz |
| STGSLD3/16 | TUNGSTEN SLIDE SINKER 3/16oz |
| STGSLD3/32 | TUNGSTEN SLIDE SINKER 3/32oz |
| 4589-301 | TUNGSTEN BOTTOM JIG GLOW ORAN/CHART 3G |
| 4589-302 | TUNGSTEN BOTTOM JIG GLOW ORAN/CHART 5G |
| 4589-303 | TUNGSTEN BOTTOM JIG GLOW ORAN/CHART 7G |
| 4589-311 | TUNGSTEN BOTTOM JIG WHITE/RED 3G |
| 4589-312 | TUNGSTEN BOTTOM JIG WHITE/RED 5G |
| 4589-313 | TUNGSTEN BOTTOM JIG WHITE/RED 7G |
| 4589-314 | TUNGSTEN BOTTOM JIG WHITE/RED 10G |
| 4589-321 | TUNGSTEN BOTTOM JIG NATURAL/GOLD 3G |
| 4589-323 | TUNGSTEN BOTTOM JIG NATURAL/GOLD 7G |
| 4589-324 | TUNGSTEN BOTTOM JIG NATURAL/GOLD 10G |
| 4589-430 | BULLET SINKER TUNGSTEN 3.5G |
| 4589-431 | BULLET SINKER TUNGSTEN 5G |
| 4589-902 | TUNGSTEN LEVEL SPIKES 1g |
| 4589-903 | TUNGSTEN LEVEL SPIKES 2g |
| 4598-111 | TUNGSTEN BOTTOM JIGS BLACK 1g |
| 4598-112 | TUNGSTEN BOTTOM JIGS BLACK 1.5g |
| 4598-113 | TUNGSTEN BOTTOM JIGS BLACK 2g |
| 4598-121 | TUNGSTEN BOTTOM JIGS UV ORANGE 1g |
| 4598-122 | TUNGSTEN BOTTOM JIGS UV ORANGE 1.5g |
| 4598-132 | TUNGSTEN BOTTOM JIGS UV GREEN 1.5g |
| 4598-133 | TUNGSTEN BOTTOM JIGS UV GREEN 2g |
| 4622-2600-4 | TUNGSTEN MICRO SINKER 4G |
| 4622-4100-35 | TUNGSTEN BULLET SINKERS MG 3,5G 3+3 |
| 4622-4100-50 | TUNGSTEN BULLET SINKERS MG 5G 2+2 |
| 4622-4100-70 | TUNGSTEN BULLET SINKERS MG 7G 2+2 |
| 4622-4100-105 | TUNGSTEN BULLET SINKERS MG 10G 2+2 |
| 4622-4100-140 | TUNGSTEN BULLET SINKERS MG 14G 2+2 |
| 4622-4101-35 | TUNGSTEN BULLET SINKERS GP 3,5G 3+3 |
| 4622-4101-50 | TUNGSTEN BULLET SINKERS GP 5G 2+2 |
| 4622-4200-18 | TUNGSTEN SLIM BULLET SINK MG 1,8G 3+3 |

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| 4622-4200-35 | TUNGSTEN SLIM BULLET SINK MG 3,5G 3+3 |
| 4622-4200-72 | TUNGSTEN SLIM BULLET SINK MG 7,2G 2+2 |
| 4622-4201-18 | TUNGSTEN SLIM BULLET SINK GP 1,8G 3+3 |
| 4622-4201-35 | TUNGSTEN SLIM BULLET SINK GP 3,5G 3+3 |
| 4622-4201-53 | TUNGSTEN SLIM BULLET SINK GP 5,3G 2+2 |
| 4622-4201-72 | TUNGSTEN SLIM BULLET SINK GP 7,2G 2+2 |
| 4622-4300-140 | TUNGSTEN TEAR DS SINKERS MG 14G 2PCS |
| 4622-4301-35 | TUNGSTEN TEAR DS SINKERS GP 3,5G 3PCS |
| 4622-4301-53 | TUNGSTEN TEAR DS SINKERS GP 5,3G 2PCS |
| 4622-4301-72 | TUNGSTEN TEAR DS SINKERS GP 7,2G 2PCS |
| 4622-4301-106 | TUNGSTEN TEAR DS SINKERS GP 10,6G 2PCS |
| 4622-4301-140 | TUNGSTEN TEAR DS SINKERS GP 14G 2PCS |
| 5826-10 | RELOAD TUNGSTEN TUBE 0,60MM 2M |
| 5826-40 | RELOAD TUNGSTEN PUTTY GREEN |
| 5826-41 | RELOAD TUNGSTEN PUTTY BROWN |
| 8036-125 | TUNGSTEN PUTTY DARK SILT |
| 8036-126 | TUNGSTEN PUTTY CAMOU |

Facilities used to process, and country of origin of, the necessary conflict minerals in our products

We are a downstream supplier but only a few steps removed from the mining of conflict minerals, and accordingly rely on the information provided to us by our suppliers to determine the country of origin of, or the facilities (i.e., the smelter or refinery) used to process, the conflict minerals contained in our products. Our supply chain is relatively short, therefore relatively easy to manage.

Efforts to determine mine or location of origin

We have determined that our due diligence efforts, including requesting our tungsten suppliers to complete the CMRT form, represent our reasonable best efforts to determine the mines or locations of origin of the conflict minerals in our supply chain.

E. Future steps to mitigate risk

Our conflict minerals program is aimed at the continuous improvement of our understanding of our supply chain and risk reduction over time. We intend to continue to take steps to improve our due diligence processes and to minimize the risk that our necessary conflict minerals benefit armed groups. Due diligence is an ongoing, proactive and reactive process, and we are continuing to work with our suppliers to identify and prevent or mitigate risks of adverse impacts associated with conflict minerals. We also intend to continue to encourage suppliers to source conflict minerals

from smelters or refiners that have been identified as “compliant” by the RMI conformant smelter lists.