



COMPANY POLICY ON THE RESPONSIBLE SOURCING OF MINERALS

4 EMME recognizes the importance of the responsible sourcing of raw materials and is committed to ensuring that the minerals used in its products are obtained in an ethical and sustainable manner, with full respect for fundamental human rights.

This policy applies to all our activities and throughout our entire global supply chain.

This policy refers in particular to the so-called 3TG minerals (tantalum, tin, tungsten, and gold):

In accordance with Regulation (EU) 2017/821, 4 EMME acknowledges that the mining and trade of these minerals, especially if originating from the Democratic Republic of Congo (DRC) and adjoining countries, or from other Conflict-Affected and High-Risk Areas (CAHRAs), can contribute to financing armed groups and fueling human rights violations.

In this context, 4 EMME adopts and promotes responsible sourcing practices also for other critical minerals, such as cobalt, applying the principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

4 EMME commits to:

Not purchasing minerals directly from CAHRAs, in particular from the DRC and adjoining countries;

Operating transparently within its supply chain, promoting material traceability down to the smelter or refiner level;

Requiring its suppliers to implement policies and management systems conforming to the OECD Guidelines and to guarantee the responsible sourcing of minerals;

Collaborating with suppliers who are actively committed to due diligence and the certification of materials used;

Constantly monitoring the supply chain to identify and reduce risks related to the use of minerals from conflict zones;

Promoting respect for human rights, safety, and environmental protection throughout the entire value chain.

Requirements for Suppliers

We ask our suppliers to:

Be informed and transparent about the origin of 3TG minerals, cobalt, and any other mineral considered at risk;

Adopt reasonable measures to source responsibly, avoiding sources that finance armed groups or violate human rights;

Have their own public policy on responsible sourcing aligned with OECD standards;

Implement traceability and risk management systems within their own supply chain;



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Apply these same standards to their own sub-suppliers;

Provide, upon request, the necessary documentation to confirm compliance with this policy, including certificates, declarations, and audits.

Should a supplier be unable or unwilling to meet the standards set forth in this policy, 4 EMME reserves the right to request the adoption of a corrective action plan with defined timelines and to reassess the business relationship and, if necessary, terminate the collaboration.

Cona, 11/04/2025



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