

Evoca Group

# Conflict Minerals Policy

## Version Control Table

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## Scope, Definitions and Overview

### Scope

This policy for a responsible global supply chain of minerals from conflict-affected and high-risk areas (hereinafter referred to as the “Policy”) applies to any director, executive, employee, collaborator (hereinafter “You” or the “Recipients”) of all companies of Evoca Group, this latter composed of Evoca S.p.A. and all its direct or indirect subsidiaries worldwide (all and each of them also referred to as “Evoca” or “We”).

### Definitions

For the purposes of the Policy, in addition to the definitions contained in other parts hereof, the terms hereinbelow shall have the following meaning:

- “**Conflict Minerals**” shall mean:
  - o minerals, such as ores and concentrates containing tin, tantalum or tungsten, and gold;
  - o metals containing or consisting of tin, tantalum, tungsten or gold;originating from the Democratic Republic of Congo and its neighbouring Countries or, in any case, from areas in a state of armed conflict or fragile post-conflict as well as areas witnessing weak or non-existent governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.
- “**Conflict Minerals Regulation**” or the “**Regulation**” shall mean Regulation (EU) 2017/821, laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold originating from conflict-affected and high-risk areas or any other applicable legislation in Countries where Evoca operates;
- “**Downstream**” means the metal supply chain from the stage following smelters and refiners to the final product;
- “**OECD Due Diligence Guidance**” means the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (Second Edition, OECD 2013), including all its Annexes and Supplements;
- “**Products**” shall mean the products traded by Evoca;
- “**Upstream**” means the mineral supply chain from the extraction sites to smelters and refiners, inclusive.

### Overview

Evoca manufactures and markets Products, that, in some of their components, may incorporate Conflict Minerals.

As Products’ components containing Conflict Minerals are furnished by third party Upstream suppliers, Evoca is a Downstream operator not subject to the rules laid down in the Regulation.

Notwithstanding, Evoca recognises the risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting Conflict Minerals, and recognises that it has the responsibility to respect human rights and not contribute to conflict.

This Policy has been drawn up taking into account the OECD Due Diligence Guidance and contains some key indications that, in accordance with Evoca’s position in the supply chain, shall enable You to create and maintain a responsible supply chain of Conflict Minerals and so foster a culture of transparency and certainty within Evoca and among its Upstream suppliers.

We commit to adopt, widely disseminate and incorporate in contracts and/or agreements with Upstream suppliers this Policy, as representing a common reference for conflict-sensitive sourcing practices and suppliers’ risk awareness from the point of extraction until end user.

## Evoca's responsible supply chain of the Conflict Minerals

### General Principles

Though not subject to the provisions of the Regulation, it is Evoca's express policy to build on its principles and thus set up a responsible supply chain of the Conflict Minerals – prohibiting, notably, those originating from the Democratic Republic of Congo and its neighbouring Countries – incorporated in some of the Products' components through due diligence on its Upstream suppliers.

To this end, other than abiding by the provisions set out below, the following general principles have to be respected:

- **no action can contribute to the financing of conflict;**
- **all relevant United Nations sanctions resolutions** or, where applicable, domestic laws implementing such resolutions must be complied with;
- **appropriate documentation** must be kept of the findings of due diligence on Upstream suppliers.

### Direct or indirect support to non-state armed groups:

We will not tolerate any direct or indirect support<sup>1</sup> to non-state armed groups through the extraction, transport, trade, handling or export of minerals.

We will immediately suspend or discontinue engagement with Upstream suppliers where We identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups.

### Public or private security forces:

We strongly condemn any direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders.

We recognise that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment and facilities, and protecting the mine site or transportation routes from interference with legitimate extraction and trade.

Where any company in our supply chain contract public or private security forces, We will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights and that individuals or units of security forces known to have been responsible for gross human rights abuses will not be hired.

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<sup>1</sup> "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- i. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; and/or
- ii. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or
- iii. illegally tax or extort intermediaries, export companies or international traders.

We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations to contribute to workable solutions on how transparency, proportionality and accountability in payments made to public security forces for the provision of security could be improved.

We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Where We identify a reasonable risk of activities inconsistent with previous paragraphs, We will suspend or discontinue engagement with Upstream suppliers after failed attempts at mitigation within six months from the adoption of an appropriate risk management plan.

#### **Bribery and fraudulent misrepresentation of the origin of minerals:**

We will not offer, promise, give or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals.

#### **Money laundering:**

We will support efforts, or take steps, to contribute to the effective elimination of money laundering where We identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

#### **Payment of taxes, fees and royalties due to governments:**

We will ensure that all taxes, fees, and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas are paid to governments.

#### **Risk management of bribery and fraudulent misrepresentation of the origin of minerals, money-laundering and payment of taxes, fees and royalties to governments:**

We commit to engage with suppliers, central or local governmental authorities, international organisations, civil society and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales.

We will suspend or discontinue engagement with Upstream suppliers after failed attempts at mitigation and, as stated above, will not make use of suppliers established in the Democratic Republic of Congo and its neighbouring Countries.

### **What We expect from our suppliers**

To ensure transparency in our supply chain, We expect our suppliers to share and act in accordance with the above principles.

In particular, our suppliers are expected to:

1. comply with the Regulation, where applicable;
2. source from socially responsible suppliers. This means We not only source from suppliers using sources from regions other than conflict-affected or high risk areas, but also source from suppliers who have

confirmed their products are not from conflict-affected or high-risk areas and, notably, from the Democratic Republic of Congo and its neighbouring Countries;

3. have policies and procedures in place to ensure that products and parts supplied to Evoca are not from conflict-affected or high risk areas;
4. periodically provide to Evoca all necessary due diligence information to confirm that all components supplied are not from conflict-affected or high risk areas;
5. pass these requirements on to their supply chain.

Compliance with the above requirements will be taken into consideration when selecting and retaining suppliers.

## Due diligence on suppliers

At least once a year, Evoca shall make a due diligence on its Upstream suppliers to ensure their compliance with the provisions of the Policy.

To this scope, a specific questionnaire (such as that under **Annex 1**) shall be sent out to all suppliers furnishing products containing Conflict Minerals.

The outcome of the due diligence will be evaluated to start or maintain the contractual relationship with Upstream suppliers, Evoca being entitled – in the event of recurring breach of the Policy by a supplier – to terminate the contractual relationship.

Proper documentation will be kept for the relevant period of law and, in any case, for 5 years from termination of the relationship with the suppliers.

The documentation will be put at disposal of the competent authority in case of checks.

## Violation of the Policy

Failure to comply with the Policy could result in penalties imposed on Evoca, individuals employed by or otherwise affiliated with Evoca, or any combination thereof.

Recipients who knowingly violate this Policy will be subject to appropriate disciplinary action.

## Grievance mechanism

If You are aware of a possible breach of this Policy from another Recipient or an Upstream supplier, please report it immediately to Your direct manager and to the Legal Department of Evoca S.p.A.

## Status and revision of the Policy

This Policy is meant to be an integral part of Evoca Code of Ethics, which contains core principles on how Evoca conducts business, and sets out Evoca's global minimum standards on Conflict Minerals.

Local laws and regulations may set stricter requirements, in which case these stricter local requirements need to be implemented by the local organization to ensure there is no conflict with this Policy.

The Policy will be periodically revised by the Legal Department of Evoca S.p.A.

Once revised, the Policy is transmitted to the Board of Directors of Evoca S.p.A., that resolves on its final approval, and then made available by the Legal Department of Evoca S.p.A. to all the companies of Evoca Group.

## Note to Employees

If You have any questions or concerns regarding this Policy, You are required to contact the Legal Department of Evoca S.p.A.

**Annex 1**  
**Template of Questionnaire**  
**to Upstream suppliers of products containing tin, tantalum, tungsten and gold (“Minerals”)**

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1. Have you in place any internal policy, procedure or system of due diligence in your supply chain of Minerals to assess and counter the risk of adverse impact due to the fact that they may come from the Democratic Republic of Congo or in its neighbouring Countries or other conflict-affected and high-risk areas and thus potentially contribute to the financing of armed groups and security forces?

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2. In the case of negative answer to question 1., are you planning to implement any of them in the next 6 months?

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3. Who are the smelters/refiners that produce the refined tin, tantalum and tungsten used in your supply chain and in the products and materials supplied to us?

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4. Who are the gold refiners that produce the refined gold used in your supply chain and in the products and materials supplied to us?

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5. Which are the country/ies of mineral origin, transit and transportation routes used between mine and such smelters/refiners?

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6. Have you checked whether the smelters/refiners have carried out all elements of due diligence for responsible supply chains of Minerals (such as set out in the latest version of the OECD Guidance for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas) and could you give us evidence thereof?

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7. Have you a shareholding or interests in companies that supply Minerals from or operate in the Democratic Republic of Congo or in its neighbouring Countries or other conflict-affected and high-risk areas?

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8. In the case any of the above information are not known to you, what actions will you take to provide us with them in the next 3 months?

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9. Have you implemented a strategy (e.g. reporting findings to designated senior management, adoption of a risk management plan) to respond to identified risks in your supply chain to prevent or mitigate adverse impacts? Could you give us evidence thereof?

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[PLACE], [DATE].

[NAME OF SUPPLIER]

The legal representative

[NAME OF THE LEGAL REPRESENTATIVE]

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