Evoca Group

Conflict Minerals Policy

Version Control Table

Version Number	Date	Comment
1.0	11 October 2019	Approved by B.o.D.
2.0	23 February 2023	Approved by B.o.D.
2.1	25 March 2026	Approved by B.o.D.
3.0	29 June 2026	Approved by B.o.D.

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Scope, Definitions and Overview

Scope

This Conflict Minerals Policy (the "Policy") applies to all directors, executives, employees and collaborators of Evoca Group, comprising Evoca S.p.A. and all its direct and indirect subsidiaries worldwide (collectively, "Evoca"). The Policy also sets out the standards expected of suppliers providing goods or components that contain tin, tantalum, tungsten or gold. These expectations are implemented through Evoca's supplier qualification, contractual and due diligence processes.

Definitions

For the purposes of this Policy:

- "**Conflict Minerals**" means tin, tantalum, tungsten and gold ("3TG"), including ores, concentrates and metals containing or consisting of these minerals.
- "**Conflict-Affected and High-Risk Areas**" or "**CAHRAs**" means areas identified by the presence of armed conflict, fragile post-conflict conditions, weak or non-existent governance or security, or widespread and systematic violations of international law, including human rights abuses.
- "**Conflict Minerals Regulation**" or the "**Regulation**" means Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of 3TG originating from CAHRAs, together with any other applicable conflict minerals legislation in the countries where Evoca operates.
- "**Downstream**" means the part of the minerals supply chain following smelters and refiners through 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, including its annexes and supplements, as amended from time to time.
- "**Products**" means products manufactured, marketed or traded by Evoca.
- "**Upstream**" means the minerals supply chain from extraction sites to smelters and refiners, inclusive.dire

Overview

Certain components used in Evoca Products may contain 3TG. Evoca generally operates downstream in the minerals supply chain and relies on information provided by suppliers to identify the origin and processing of minerals contained in those components.

Evoca recognises that the extraction, trade, transport, handling and export of minerals can be associated with serious human rights abuses, conflict financing, corruption, money laundering and other adverse impacts. Evoca is therefore committed to responsible and conflict-free sourcing and to avoiding any contribution to conflict or human rights abuses through its supply chain.

This Policy reflects Evoca's position in the supply chain and is informed by the OECD Due Diligence Guidance, the Regulation where applicable, and recognised industry tools and standards, including those developed by the Responsible Minerals Initiative ("RMI").

Responsible sourcing does not require a general withdrawal from CAHRAs. Evoca applies a risk-based approach intended to identify, prevent, mitigate and, where necessary, address adverse impacts while supporting legitimate and responsible mineral trade.

Evoca's responsible sourcing principles

General Principles

Evoca seeks to build and maintain a transparent and responsible supply chain for 3TG contained in its products. In particular, Evoca:

- does not tolerate sourcing practices that directly or indirectly finance conflict or contribute to serious human rights abuses
- complies with applicable sanctions, export control and conflict minerals requirements
- conducts risk-based due diligence proportionate to its downstream position, the available information and the level of risk identified
- engages with suppliers to improve supply chain transparency and support corrective or mitigation actions where appropriate
- maintains relevant due diligence records in accordance with applicable legal and internal retention requirements.

Direct or indirect support to non-state armed groups:

Evoca does not tolerate human rights abuses associated with mineral extraction, transport, trade, handling or export. Evoca also rejects direct or indirect support to non-state armed groups, including sourcing from, making payments to, or otherwise providing logistical assistance or equipment to groups or affiliates that illegally control mine sites or transport routes, or illegally tax or extort minerals, intermediaries, exporters or traders.

Where a reasonable risk of such conduct is identified, Evoca will seek appropriate evidence and suspend or discontinue the relevant sourcing relationship where the risk cannot be satisfactorily addressed.

Public or private security forces:

Evoca condemns direct or indirect support to public or private security forces that illegally control mine sites, transport routes or upstream actors, or that illegally tax or extort money or minerals.

Where security forces are present in the supply chain, their role should be limited to maintaining the rule of law, safeguarding human rights and protecting workers, facilities and legitimate trade. Engagement of security providers should be consistent with recognised standards, including the Voluntary Principles on Security and Human Rights, where relevant.

Where risks relating to security forces are identified, Evoca expects suppliers to cooperate in developing and implementing appropriate mitigation measures within a reasonable timeframe. Continued engagement will be assessed in light of the severity of the risk and the effectiveness of mitigation.

Bribery, fraudulent misrepresentation and money laundering

Evoca prohibits bribery and fraudulent misrepresentation intended to conceal or disguise the origin, ownership, transport route or chain of custody of minerals. It also supports efforts to prevent and address money laundering connected with mineral extraction, trade, transport, handling or export.

Relevant transactions and supporting information are expected to be accurate, transparent and traceable, with appropriate controls proportionate to the identified risks.

Taxes, fees and royalties

Evoca supports the lawful and transparent payment of taxes, fees and royalties relating to mineral extraction, trade and export. Suppliers are expected to comply with applicable fiscal and regulatory obligations and to provide reasonable evidence where this is relevant to identified supply chain risks.

What We expect from our suppliers

Suppliers providing goods or components containing 3TG are expected to support Evoca's commitment to responsible and conflict-free sourcing and to comply with applicable laws and contractual requirements.

Relevant suppliers are expected to:

1. maintain policies and due diligence processes proportionate to their position and risk exposure in the supply chain
2. identify whether 3TG is contained in goods or components supplied to Evoca and provide accurate, complete and up-to-date information on its origin and supply chain
3. use recognised reporting tools, including the RMI Conflict Minerals Reporting Template ("CMRT"), where requested by Evoca
4. identify relevant smelters and refiners and, where practicable, favour facilities participating in recognised responsible minerals assurance programmes
5. assess and manage risks associated with minerals originating from CAHRAs, without applying an automatic geographic ban
6. communicate equivalent expectations to relevant suppliers in their own supply chains
7. retain appropriate supporting documentation and make it available to Evoca upon reasonable request
8. cooperate in corrective or mitigation actions where gaps or risks are identified

Compliance with these expectations is considered in supplier selection, qualification, evaluation and ongoing business decisions.

Due diligence and risk management

Evoca applies a risk-based approach to the responsible sourcing of tin, tantalum, tungsten and gold, taking into account its position in the downstream supply chain.

Relevant suppliers are expected to provide accurate and appropriate information on the presence and origin of these minerals and, where available, on the smelters and refiners involved in their supply chains.

The geographic origin of minerals is considered as part of the assessment and does not, in itself, automatically determine the exclusion of a supplier.

Where gaps or concerns are identified, Evoca may request clarification, supporting documentation or appropriate corrective action. The nature and extent of any follow-up are determined in proportion to the relevance and severity of the identified risk.

Persistent failure to provide adequate information or to address material concerns is taken into account in supplier evaluation and in decisions concerning the continuation of the business relationship.

Reporting concerns

Employees and other relevant stakeholders are encouraged to report suspected breaches of this Policy or concerns relating to mineral sourcing through their usual Evoca contact, the Legal Department at legal@evocagroup.com, or Evoca's whistleblowing platform at https://evocagroup.integrityline.com.

Reports are handled confidentially and, where permitted, may be submitted anonymously. Retaliation against anyone who raises a concern in good faith is prohibited.

Violation of the Policy

Breaches of this Policy by Evoca personnel may result in disciplinary action in accordance with applicable laws, collective agreements and internal rules.

Non-compliance by suppliers may lead to requests for corrective action, enhanced monitoring, suspension of new business or termination of the relevant contractual relationship, depending on the nature and severity of the issue and in accordance with applicable laws and contractual terms.

Status and revision of the Policy

This Policy sets out Evoca's global principles and minimum standards for the responsible sourcing of tin, tantalum, tungsten and gold. Where applicable laws, regulations or contractual requirements establish stricter standards, the stricter requirements apply.

The Policy is maintained by the Legal Department in coordination with Procurement and Sustainability and is reviewed periodically to reflect regulatory developments, recognised international guidance, supply chain risks and business needs.

Note to Employees

Questions regarding this Policy may be addressed to the Legal Department or the Sustainability Committee.