

Responsible Sourcing of Raw Materials Policy

This Responsible Sourcing of Raw Materials Policy applies worldwide to Inventronics and all suppliers of Inventronics. It specifies requirements for the supply of items containing tin, tungsten, tantalum or gold to Inventronics, and defines and clarifies the tasks and responsibilities of all suppliers to Inventronics. Inventronics and its divisions, business units, regions and countries as well as global / corporate functions shall cooperate in accordance with this Policy

Document Responsibilities

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Version History

Version/No.	Publication Date	Reviewed by	Approved by	Description of changes
01	31/01/2024	A.Garzieri	L.Bordin	First emission

CONTENT

Document Responsibilities	1
Version History	1
1. GENERAL PRINCIPLES & DUE DILIGENCE	3
1.1 Definitions	4
2. SUPPLIER CONTRACTUAL OBLIGATIONS	5
2.1 Managing of conflict Minerals & EXTENDED MINERALS REPORTING TEMPLATE: FLOW CHART	6
3. RESPONSIBLE SOURCING OF RAW MATERIALS STRATEGY IMPLEMENTATION	7

1. GENERAL PRINCIPLES & DUE DILIGENCE

Inventronics takes a holistic approach to the responsible sourcing of minerals that contribute to armed conflict or human rights abuses in Conflict Affected and High-Risk Areas (CAHRA) such as The Democratic Republic of the Congo (DRC) and other adjoining countries (the Democratic Republic of Congo (DRC) and nine adjoining countries: Republic of Congo, Central Africa Republic, South Sudan, Zambia, Angola, Tanzania, Burundi, Rwanda and Uganda).

Inventronics has initiated a process that meets the Organization for Economic Co-operation and Development (OECD) framework to comply with applicable law regarding conflict minerals. This includes establishing compliance requirements for its direct suppliers regarding conflict minerals, implementing controls and reporting, undertaking appropriate sourcing efforts, and providing its customers the data necessary to facilitate reporting.

The aim is for all products, which are manufactured or contracted to be manufactured by Inventronics to be DRC Conflict-Free.

This means that the minerals in products can be sourced from:

- ✓ mines in countries outside of the DRC or adjoining countries; or
- ✓ mines within the DRC or adjoining countries if the appropriate certification and traceability is in place.

To promote company compliance with human rights and to prevent direct or indirect contribution to conflicts through mineral sourcing practices, the OECD has developed the OECD Due Diligence Guidance.

Inventronics and its subsidiaries have adopted a policy on sourcing components and materials from companies that share our values regarding respect for human rights, integrity and environmental responsibility. By implementing the recommendations of the OECD Due Diligence Guidance.

It means:

- ✓ Ensure that global and EU smelters and refiners of 3TG source responsibly.
- ✓ Help break the link between conflict and the illegal exploitation of minerals.
- ✓ Help put an end to the exploitation and abuse of local communities, including mine workers, and support local development.

1.1 DEFINITIONS

Term	Definition
Conflict Minerals	<p>The term “conflict minerals” is defined as:</p> <ul style="list-style-type: none"> columbite-tantalite, also known as coltan (from which tantalum is derived); cassiterite (tin); gold; wolframite (tungsten); or their derivatives; <p>– or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country;</p>
EMRT	Extended Minerals Reporting Template
CMRT	Conflict Minerals Reporting Template is a free, standardized reporting template that facilitates the transfer of information through the supply chain regarding mineral country of origin and smelters and refiners being utilized.
DRC Conflict-Free	<p>Minerals in a product are sourced from either:</p> <ul style="list-style-type: none"> Mines in countries outside of the DRC or adjoining countries; or Mines within the DRC or adjoining countries if the appropriate certification and traceability is in place.
Dodd-Frank Consumer Protection Act	<p>The law of the United States that regulates the financial markets and protects consumers.</p> <p>Section 1502 of that act addresses the international trade and use of Conflict Minerals.</p>
OECD	Organization for Economic Co-operation and Development
Relevant Supplier	Supplier of those products that contain Tin, Tungsten, Tantalum, and/or Gold, where these metals are necessary for functionality of the product, and where Inventronics has discretion over manufacturing or design.
RMI	Responsible Minerals Initiative
3TG	Tin, tungsten, tantalum and gold
SEC	United States Securities and Exchange Commission

2. SUPPLIER CONTRACTUAL OBLIGATIONS

Inventronics includes the Responsible sourcing of raw materials into dealings with Relevant Suppliers through its own Code of Conduct, as follows:

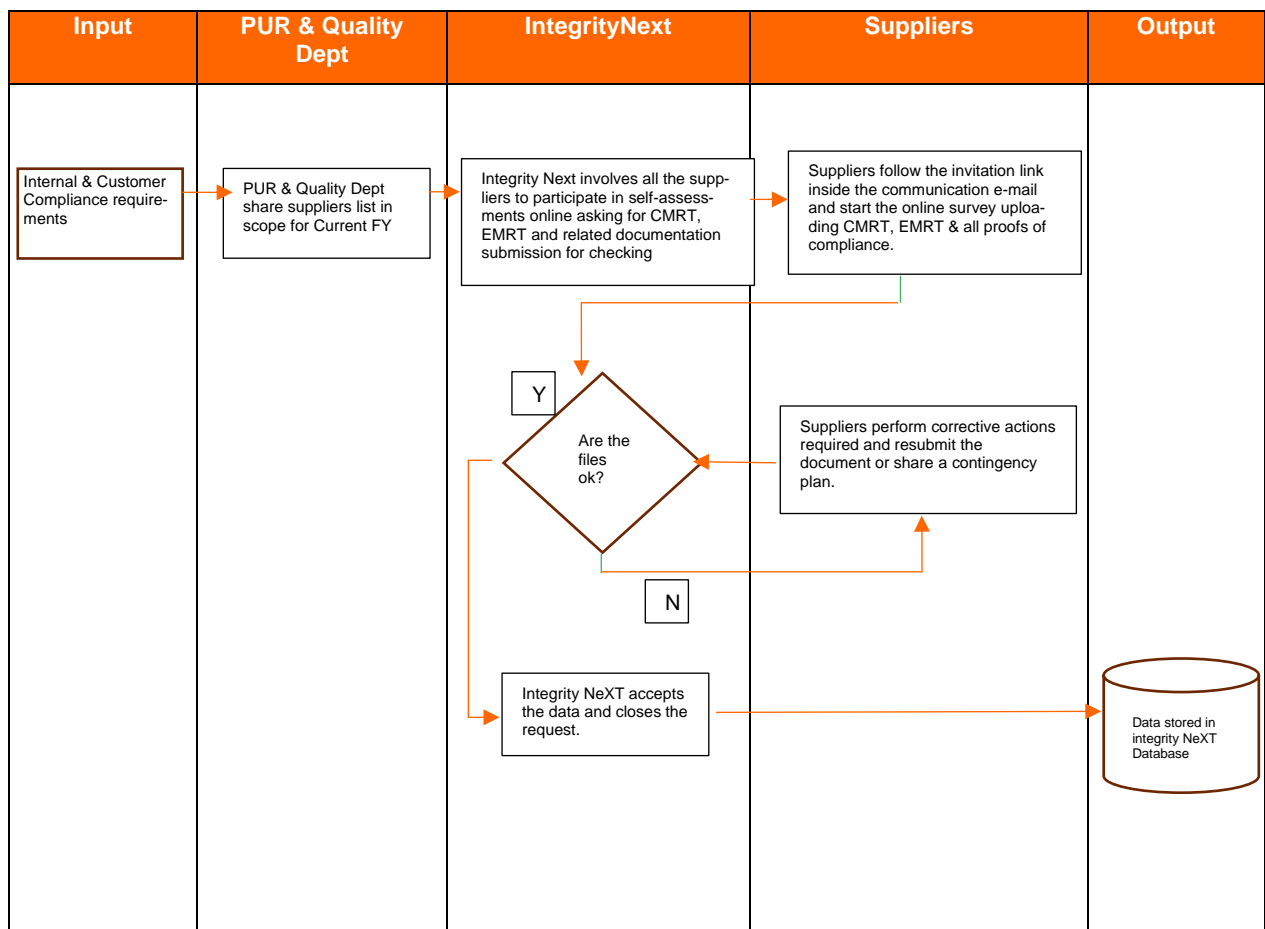
- ✓ Inventronics' Suppliers should not include in any products sold to us any Conflict Minerals that are not DRC Conflict Free;
- ✓ Inventronics' Suppliers should develop Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals that are not DRC Conflict Free from being included in the products sold to Inventronics;
- ✓ Inventronics' suppliers are expected to source Conflict Minerals only from sources that are DRC Conflict Free;

In doing so, suppliers must:

- ✓ Implement and communicate to their personnel and suppliers policies that are consistent with this Policy, and require their direct and indirect suppliers to do the same;
- ✓ adopt a risk mitigation strategy to respond to identified risks in its supply chain which, as a minimum requirement, shall meet the standards set forth in the OECD Due Diligence Guidance;
- ✓ Put in place procedures for the traceability of Conflict Minerals, working with their direct and indirect suppliers as applicable;
- ✓ Use reasonable efforts to source Conflict Minerals from smelters and refiners validated as being DRC Conflict Free, and require their direct and indirect suppliers to do the same;
- ✓ Advise us of any determination that the supplier either has concluded or has a reasonable basis to believe that products it currently sells or has sold to Inventronics are DRC Conflict Free;
- ✓ Maintain reviewable business records supporting the source of Conflict Minerals; and
- ✓ from time to time, at Inventronics request, provide Inventronics with information concerning the origin of Conflict Minerals included in products sold to Inventronics, which Inventronics shall be entitled to use or disclose in satisfying any legal or regulatory requirements or in any customer or marketing communications, notwithstanding the terms of any confidentiality agreements that do not specifically reference this paragraph.
- ✓ Fully comply with Inventronics "Code of Conduct" which shall include the right of Inventronics to audit Supplier's compliance with the provision of the present Responsible Sourcing of Raw Materials Policy

2.1 MANAGING OF CONFLICT MINERALS & EXTENDED MINERALS REPORTING TEMPLATE: FLOW CHART

For Managing of Conflict Minerals Reporting Template and Extended Minerals Reporting Template, Inventronics has partnered with IntegrityNext, a market-leading solution for supply chain sustainability management that supports Inventronics for collecting CMRT and EMRT data from suppliers.



Integrity Next involves all the suppliers to participate in self-assessments online asking for CMRT, EMRT and related documentation submission, for verification.

IntegrityNext self-assessments also cover these aspects:

- anti-bribery & anti-corruption
- environmental protection
- human rights & labor
- health & safety
- supply chain responsibility

3. RESPONSIBLE SOURCING OF RAW MATERIALS STRATEGY IMPLEMENTATION

Suppliers must establish internal management systems and processes to ensure that the requirements of this Policy are observed.

In order to ensure that the requirements of the Policy are met in the supply chain Inventronics evaluates its relationships with its suppliers on an ongoing basis.

Suppliers must observe strict compliance of the Policy. Any breach of the policy may be considered by Inventronics in its sole discretion as a material breach of the Suppliers' agreement / contract with Inventronics.

If Inventronics determines that a Supplier failed to comply with this Policy and the supplier fails to cooperate in developing and implementing reasonable remedial steps, Inventronics can activate its escalation process as described in Supplier Escalation Management (QM8200), Inventronics at its sole discretion may cancel a purchase order or to take appropriate actions up any agreement / contract with the Supplier.

Nothing in this Policy is intended to in any way grant any additional rights or expectations to a Inventronics supplier or in any way modify or otherwise limit in any way any of Inventronics contractual or legal rights.