

Responsible Minerals Policy

This document outlines the Technetix policy regarding responsible minerals sourcing in our supply chain.

Why is it important?

Certain minerals such as tantalum, tungsten, tin, gold, and cobalt are essential components in electronics. In parts of the Democratic Republic of Congo (DRC), surrounding countries, and other global Conflict Affected and High-Risk Areas (CAHRAs), the profits from the extraction of these minerals can be used to finance armed groups, fuel forced labor and other human rights abuses, contribute to environmental degradation, and support bribery and corruption.

Technetix is committed to responsible minerals sourcing and expects suppliers to support a risk-based due diligence process designed to identify, prevent, mitigate, and, where appropriate, remediate adverse impacts associated with minerals in our supply chain.

Scope of this Policy

This policy applies to tin, tantalum, tungsten, gold (known as 3TG or 'conflict minerals'), cobalt, and other minerals associated with human rights abuses or environmental harm (minerals of concern). It is applicable to all suppliers of products and components containing these minerals and metals.

Our Approach

Technetix aligns its responsible minerals program with the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) and relevant requirements, including Section 1502 of the US Dodd-Frank Act and the EU Conflict Minerals Regulation. Although we do not directly source minerals, we recognise that complex, multi-tier supply chains require ongoing, risk-based due diligence and management oversight.

Technetix does not expect automatic disengagement from Conflict-Affected and High-Risk Areas. Consistent with OECD expectations, we support responsible sourcing where risks are identified, assessed, and managed. Suppliers are expected to maintain policies and due diligence processes covering 3TG, cobalt, and other minerals of concern, including serious human rights abuses, support to armed groups or abusive security forces, bribery, fraudulent origin claims, money laundering, and non-payment of taxes, fees, and royalties.

Smelters and refiners are key control points in mineral supply chains. Technetix supports the Responsible Minerals Initiative's [Responsible Minerals Assurance Process \(RMAP\)](#) and other recognised cross-industry assessment programs as tools to evaluate due diligence alignment. We use supplier disclosures, risk indicators, and available industry data to prioritise risk and guide engagement and mitigation.

Our Objectives

Technetix is committed to conducting risk-based due diligence to identify, assess, prioritise, and mitigate adverse impacts in our supply chain related to 3TG, cobalt, and other minerals of concern. This includes risks linked to serious human rights abuses, the worst forms of child labour, forced labour, direct or indirect support to armed groups or abusive security forces, bribery, fraudulent misrepresentation of origin, money laundering, non-payment of taxes, fees and royalties due to governments, and other significant environmental, social, and governance risks. We will:

- **Assess and prioritise risk:** Evaluate in-scope suppliers annually using product data, supplier engagement, recognised reporting templates, and available smelter and refiner risk information, prioritising critical suppliers and higher-risk supply chains for enhanced review.
- **Strengthen due diligence coverage:** Continue to apply due diligence to 3TG and expand and refine processes for cobalt and other minerals of concern based on risk, data availability, regulatory developments, and customer expectations.
- **Engage suppliers:** Require supply partners to maintain responsible minerals policies and management systems, provide current and complete due diligence information on request, cascade equivalent expectations through their upstream supply chains, and support corrective action where risks are identified.
- **Manage and monitor performance:** Track progress against the following key measures:
 - **Supplier Assessment Coverage:** Target annual assessment of 100% of critical suppliers and 95% of in-scope suppliers.
 - **Supplier Due Diligence Reporting Quality:** Target a high response rate from in-scope suppliers subject to a formal reporting request, with at least 95% of submissions assessed as complete, internally consistent, and suitable for review.
 - **Smelter and Refiner Risk Review:** Screen identified smelters and refiners against recognised industry information and prioritise non-conformant, inactive, or otherwise red-flagged facilities for supplier follow-up and risk mitigation.
 - **Corrective Action Management:** Implement and monitor time-bound corrective action plans for identified medium- and high-risk cases, with escalation where progress is not demonstrated.

Responsibilities

Suppliers

Where products manufactured for or supplied to Technetix contain 3TG, cobalt, or other minerals of concern, the supplier must:

- Establish and maintain a responsible minerals policy and management system appropriate to its business, supply chain, and risk profile, and communicate equivalent expectations to relevant upstream suppliers.
- Conduct supply chain due diligence and survey its relevant supply chain to the smelter or refiner level using the latest applicable Responsible Minerals Initiative reporting templates, including the Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT), or other recognised industry-standard tools where appropriate.
- Use reasonable best efforts to source from smelters and refiners that are conformant with, or actively participating in, the RMAP or another recognised cross-industry assessment program, and support risk mitigation where non-conformant or red-flagged facilities are identified.
- Maintain records to support the accuracy and completeness of due diligence disclosures and provide timely responses to Technetix requests for information, clarification, and corrective action.
- Implement risk mitigation measures where actual or potential adverse impacts are identified, including root cause analysis, time-bound corrective action plans, escalation to relevant management, and monitoring of effectiveness.
- Notify Technetix promptly where the supplier becomes aware of a material responsible minerals risk or a significant change in the smelters, refiners, or sourcing circumstances relevant to products supplied to Technetix.

If Technetix identifies a product, supplier, smelter, or refiner that may be associated with elevated responsible minerals risk, we will apply a risk-based response proportionate to the severity and nature of the issue. This may include enhanced due diligence, supplier engagement, documented corrective action plans, monitoring of progress, and escalation to senior management where appropriate.

- a) Work with the supplier to identify the root cause and implement a time-bound corrective action plan.
- b) Encourage participation in recognised assessment or improvement programs where a smelter or refiner is not yet conformant.
- c) Monitor progress and require evidence of implementation.
- d) Suspend or disengage from relevant sourcing relationships when severe risks are not mitigated, where required by law, or where suppliers fail to make substantive and good-faith efforts to address identified issues.

Technetix may suspend or terminate business relationships with suppliers that do not make substantive, good-faith efforts to comply with this Responsible Minerals Policy and our [Supplier Code of Conduct](#).

Technetix

- The Quality & Compliance team is responsible for maintaining the Technetix responsible minerals management system, coordinating supply chain due diligence, assessing supplier responses, and overseeing corrective action follow-up.
- Employees involved in procurement, supply chain management, quality, sustainability, and compliance are responsible for applying this policy within their areas of responsibility and escalating relevant risks or concerns.
- Senior management will review significant responsible minerals risks, support the implementation of risk mitigation plans, and allocate appropriate resources for the effective operation of this program.
- The Technetix board and executive team are responsible for oversight of our sustainable procurement framework and for promoting accountability for responsible minerals due diligence.

Monitoring and Review

To help ensure that this policy is effective, we will:

- Use recognised supply chain monitoring sources, current industry guidance, and the latest applicable reporting templates to identify, assess, and prioritise responsible minerals risks.
- Periodically review the effectiveness of our due diligence process, including supplier response quality, risk mitigation outcomes, and opportunities for continuous improvement.
- Report annually on our responsible minerals due diligence approach and progress.

Raising Concerns

Technetix employees, suppliers, and other stakeholders are encouraged to raise concerns regarding compliance with this policy, including concerns related to mineral origin, smelters or refiners, forced labour, child labour, conflict financing, bribery, corruption, or other human rights and responsible sourcing risks in our supply chain. Please contact our purchasing team or use our confidential reporting portal:

<https://whistleblowersoftware.com/secure/technetix>

