

SUPPLY CHAIN POLICY FOR MINERALS AND METALS POTENTIALLY ORIGINATING FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

We, Koki Europe Sp. z o.o., hereby set forth this common policy and commitment, establishing principles for the responsible extraction, transport, handling, trading, processing, smelting, refining, alloying, and export of minerals. This policy is consistent with regulation (EU) 2017/821 and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Annex II) and is a part of our purchasing policy.

Recognising that risks of significant adverse impacts which may be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas, and recognising that we have the responsibility to respect human rights and not contribute to conflict, we commit to adopt, widely disseminate and incorporate in contracts or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas, as representing a common reference for conflict-sensitive sourcing practices and suppliers' risk awareness from the point of extraction until end user. We commit to refraining from any action which contributes to the financing of conflict and we commit to comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions as described in our Corporate Social Responsibility (CSR) policy.

We commit to the due diligence steps and recommendations as mentioned in regulation (EU) 2017/821 and OECD Due Diligence in areas of our possibilities and responsibilities according to real situations, which according to the down description will apply to us and our suppliers:

A. With respect to serious misuse related to the extraction, transportation or trade of minerals, the Company will not tolerate or in any way profit, contribute to, assist in or facilitate the commission of any other entity in the supply chain in which it participates:

- i all forms of torture and cruel, inhuman, or degrading treatment.
- ii. any form of forced or compulsory labour which means work or the provision of services which are required of any person on pain of penalty and which the person concerned has not voluntarily volunteered to perform.
- iii. the worst forms of child labour.
- iv. other serious human rights violations and abuses, such as large-scale sexual violence.
- v. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

B. With respect to serious abuse risk management: The Company will suspend or terminate cooperation with suppliers of raw materials if it determines that there is a reasonable risk that supplier's source from any entity that has committed serious abuse listed in point 1 (above).

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C. With respect to direct or indirect support to non-state armed groups: The Company will not tolerate direct or indirect support to non-state armed groups through the extraction, transport, trade, processing or export of minerals. Support to non-state armed groups in this respect includes m.in, the acquisition of minerals from, payments to non-state armed groups or entities associated with them, or in any other way the provision of logistical assistance or the provision of equipment to such groups or entities which:

- i. unlawfully controls or otherwise control mining sites, mineral trading points and upstream operators in the supply chain; or
- ii. unlawfully levy taxes or extort money or minerals at mine access points, along transport routes or at points where minerals are traded; or
- iii. unlawfully tax or extort money from intermediaries, exporting companies or international trading companies.

D. With respect to the risk management of direct or indirect support to non-state armed groups: The Company will suspend or terminate cooperation with suppliers of raw materials if it determines that there is a reasonable risk that suppliers obtain from or are affiliated with any entity that provides direct or indirect support to non-state armed groups as defined in point C.

E. Regarding public or private security forces:

- i. The Company supports the thesis that support for public or private security forces that unlawfully control mines, transport routes and upstream entities should be eliminated; unlawfully impose taxes or extort money or minerals at mine access points, along transport routes or at points where minerals are traded; or unlawfully tax intermediaries, exporting companies or international trading companies, or extort money from them.
- ii. The Company recognizes that the role of public or private security forces in mines or surrounding areas or along transport routes should be solely to uphold the rule of law, including the protection of human rights, to ensure the safety of mine workers, equipment and facilities, and to protect mines or transport routes from interference with legitimate mining and trade.
- iii. The Company supports international efforts to take action to create assurances that individuals or units of security forces known to be responsible for gross human rights violations will not be employed.
- iv. The Company supports efforts to contribute to the development of solutions on how to improve transparency in payments to security forces for security services.
- v. The Company supports international efforts to reduce the risk for vulnerable groups, in particular manual or small-scale miners, to the negative effects of the presence of security forces, public or private, on the mine grounds.

F. With respect to the management of risks related to public or private security forces: The Company will suspend or terminate cooperation with suppliers of raw materials in order to prevent or mitigate the risks associated with direct or indirect support to public or private security forces referred to in point 5, where it determines that such a reasonable risk exists.

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G. With respect to bribery and misrepresentation of the origin of minerals: The Company will not offer, promise, give or solicit any bribe, and will not solicit bribes to conceal or alter the origin of minerals in order to mislead with respect to taxes, fees and royalties paid to governments for the extraction and trading of minerals, processing, transport and export.

H. With regard to money laundering: The Company will support efforts and activities to contribute to the effective elimination of money laundering, in particular where a reasonable risk of money laundering arising from the extraction, trade, transport or export of minerals is identified, related to the illegal imposition of taxes or the extortion of minerals at the access points to the mine, along transport routes or at points where minerals are traded by raw material suppliers, or the risks associated with such activities.

I. With respect to the payment of taxes, fees and royalties to governments: The Company supports all initiatives to create the conditions for all taxes, fees and royalties related to the extraction, trade and export of minerals from conflict-affected and high-risk areas to be paid to governments and in accordance with the company's position in the supply chain.

J. With regard to managing the risks associated with bribery and misrepresentation of minerals and money laundering to corrupt governments: Taking into account its position in the supply chain, the Company undertakes to cooperate with suppliers, central or local government authorities, international organizations, civil society and, where applicable, with third parties concerned, in improving and tracing the results of the actions taken to prevent or mitigate the risk of adverse impacts by taking measurable action within a reasonable timeframe. The Company will suspend or terminate cooperation with suppliers of raw materials if it becomes known that they are involved in bribery and/or providing false information about the origin of minerals, as well as money laundering for corrupt governments.

We set up clear and coherent management process to ensure risks are adequately managed.

Lućmierz-Las, Poland, 23/01/2026

Signed by:



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President of the Board: