

Responsible Minerals Sourcing Policy

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Purpose

Clavister is committed to conducting its business in an ethical, responsible and sustainable manner. The purpose of this policy is to ensure that minerals used in hardware products sold, delivered or integrated by Clavister do not contribute to armed conflict, serious human rights abuses, corruption or other unacceptable practices.

This policy specifically covers the following conflict minerals:

- Tantalum
- Tin
- Tungsten
- Gold

(collectively referred to as "3TG minerals").

Scope

This policy applies to:

- Hardware products sold, delivered or integrated by Clavister
- Hardware supplied by external manufacturers whose branded products are delivered by Clavister
- Relevant parts of the supply chain associated with such hardware

As Clavister does not mine, extract or process minerals directly, this policy is implemented through requirements placed on hardware manufacturers and other relevant suppliers.

Commitment

Clavister commits to:

- Not knowingly sourcing minerals that directly or indirectly finance armed conflict or contribute to serious violations of human rights.
- Aligning its approach with internationally recognized frameworks and regulations, including:
 - OECD Due Diligence Guidance for Responsible Supply Chains of Minerals
 - EU Conflict Minerals Regulation (EU) 2017/821
- Integrating responsible minerals sourcing requirements into supplier management, procurement processes and public framework agreements where applicable.

Requirements for Hardware Manufacturers and Suppliers

Clavister expects hardware manufacturers and other relevant suppliers to:

- Maintain a **publicly available policy** for responsible minerals sourcing
- Identify and, where applicable, trace the origin of 3TG minerals used in their products
- Conduct risk assessments in their supply chains related to conflict minerals
- Source minerals from smelters and refiners validated through recognized audit programs, such as the Responsible Minerals Initiative (RMI), or equivalent schemes
- Implement corrective actions where risks are identified

Clavister reserves the right to request documentation that reasonably demonstrates compliance with these requirements.

Due Diligence and Follow-up

Clavister's due diligence activities related to responsible minerals sourcing include:

- Reviewing publicly available conflict minerals policies and disclosures from hardware manufacturers
- Incorporating conflict minerals considerations into supplier and hardware assessments
- Following up on requirements within the scope of public procurement contracts and customer obligations
- Documenting identified risks, deviations and mitigation measures

Where significant risks are identified, the relevant supplier will be:

- Informed of the findings
- Given the opportunity to implement corrective actions
- Subject to potential restriction or phase-out if risks are not adequately addressed

Transparency and Disclosure

Clavister strives for transparency in its sustainability work and will, upon request, provide information on how this policy is implemented. This policy is publicly available on Clavister's website.

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