

# DATAMARS CONFLICT MINERALS GUIDELINES

## 1 Purpose and Scope

The Datamars Group (“**Datamars**”, “**we**”, “**us**”, “**our**”) is committed to promoting responsible sourcing practices and respecting human rights in all our operations worldwide and throughout our global supply chain. These Guidelines include our commitment to the responsible sourcing of “Conflict Minerals”, currently designated as tin, tungsten, tantalum and gold (3TG) from Conflict-Affected and High-Risk Areas (CAHRA’s list available at <https://www.cahraslist.net/>) to ensure the avoidance of Conflict Minerals in our supply chain.

## 2 Application

These Guidelines apply to all sites, workers and employees of Datamars and its suppliers (including permanent, temporary, agency and migrant workers), as well as subcontractors, agents and subsidiaries. We expect our suppliers to communicate the requirements of these Guidelines through their own supply chains down to the primary production level, to ensure that they too comply with the principles set out in the Guidelines.

## 3 Commitment to responsible procurement and measures

Datamars requires itself and its suppliers to ensure that Datamars products are free of Conflict Minerals that directly or indirectly originate from or support Conflict-Affected and High-Risk Areas. As a downstream company of manufacturing and operating systems and components for various industries, we do not source minerals or metals directly from mines, smelters or refineries and/or import them directly into any of our entities, nor are we directly involved in or support any activity to move minerals and metals from the downstream mining site into the end product for end users. However, we are aware that our suppliers' parts and components may contain small amounts of Conflict Minerals in their supply chain. Therefore, we conduct supplier due diligence to ensure compliant and responsible sourcing of goods and services throughout our supply chain.

To date, in pursuit of these commitments, we have taken a number of measures including:

- updating Datamars Supplier Code of Conduct (“SCoC”).
- adopting this Conflict Minerals Guidelines.
- establishing internal for Datamars Conflict Minerals compliance program to review the use of Conflict Minerals in our products and to be in a position to fulfil our obligations and respond to customer enquiries.
- requiring our suppliers to comply with and implement their own supplier a Code of Conduct and policies regarding Conflict Minerals and to exercise due diligence to investigate the source of these minerals.
- engaging with our suppliers so that they respond in a timely manner to our requests for evidence of compliance.
- requesting suppliers to provide us with necessary information relating to the potential use and source of any conflict minerals and metals in any products they may provide to us.

## 4 Roles and Responsibilities

In order to facilitate and ensure compliance with the Regulations, under the oversight of our Management, Datamars created a multi-functional conflict minerals team. The conflict minerals team has the overall responsibility for developing, implementing and reviewing our Conflict Minerals compliance strategy, as well as for reviewing the ongoing progress and effectiveness of the Conflict Minerals policies.

## 5 Supplier management system

Datamars has designed a Conflict Minerals compliance program to conform, in all material respects, with the framework described in the Regulations and to review the use of Conflict Minerals in our products and to be in a position to fulfil our obligations and respond to customer inquiries. This program includes the following tasks:

- **Establishing Policies and Procedures.**

Datamars has established internal policies and procedures to ensure that the required due diligence is performed on its suppliers and the results are taken into account for the supplier selection and/or award process. In addition, Datamars has established the SCoC to also engage its suppliers in compliance with the Regulations and to support Datamars in its efforts to comply and adhere to the Regulations.

- **Due Diligence**

The principles of these Guidelines are based on supplier engagement, through dialogue and mutual trust, and Datamars promotes as much as possible transparency and working in collaboration with its suppliers. Datamars conducts supply chain due diligence on Conflict Minerals to identify possible content of Conflict Minerals within the goods purchased from the suppliers, and which are finally used in its end products. This due diligence will include:

- **Identification and Risk Assessment:** We will identify the presence of 3TG in our supply chain and assess the risk of sourcing from regions associated with Conflict-Affected and High-Risk Areas. We will use reasonable efforts to determine the country of origin of the minerals used in our products.
- **Supplier Engagement:** We will work closely with our suppliers to communicate our expectations regarding Conflict Minerals. We will request our suppliers to provide information about the origin of the minerals they supply, and we will encourage them to adopt responsible sourcing practices.
- **Supplier Audits and documentation:** We may request our suppliers to provide us with additional documentation, self-assessment or conduct audits of their facilities to verify the accuracy of the information provided and ensure compliance with these Guidelines. We will also encourage our suppliers to obtain third-party certifications, to validate responsible sourcing practices.

- **Training**

Datamars will provide training to its employees and suppliers to raise awareness of the issue of Conflict Minerals and the importance of responsible sourcing, if necessary.

- **Continuous Improvement**

Datamars will continuously monitor and review its policies and procedures to ensure that they remain effective in addressing the issue of Conflict Minerals and reflecting industry best practices and regulatory requirements. Datamars will work with its suppliers to improve their due diligence processes and encourage them to adopt responsible sourcing practices.

## 6 Risk management

In cases where minerals in our supply chain are identified as potentially coming from Conflict-Affected and High-Risk Areas, we will take appropriate measures to mitigate the risk, including:

- **Supplier improvement:** We will work with suppliers to address identified risks and support their efforts to improve responsible sourcing practices. We will encourage them to develop and implement a policy regarding Conflict Minerals and exercise due diligence to investigate the source of these minerals and establish robust traceability systems and strengthen their supply chain transparency.
- **Sourcing alternatives:** If we determine that a supplier cannot or will not comply with these Guidelines, we will seek alternative suppliers that demonstrate a commitment to responsible sourcing.

## 7 Implementation and enforcement

These Guidelines are in force as of 1<sup>st</sup> of January 2024. The implementation and enforcement of these Guidelines in the supply chain is supported by the SCoC.

These Guidelines outline our position on conflict minerals and metals and their alignment with various regulations, including the Swiss Code of Obligations, Swiss Due Diligence and Transparency Ordinance (DDTrO), or any other applicable regulation (collectively referred to as "Regulations").

## 8 Whistleblower system

We expect our suppliers to immediately communicate any potential or effective failure to comply with these Guidelines and any applicable laws, regulations or any contractual agreements with Datamars. This includes violations by any employee, adviser, partner, agent or any other representative acting on behalf of either the supplier or Datamars. Reports can be made through email directly to [GroupComplianceOfficer@datamars.com](mailto:GroupComplianceOfficer@datamars.com) or through an independent web-based channel <https://datamars.integrityplatform.org/>.