

**Raycap**

RESPONSIBLE MINERALS SOURCING POLICY



## Table of Contents

1. Document Management .....	4
2. Purpose & Scope .....	4
3. Governance & Oversight .....	4
4. Policy Statement.....	5
5. Grievance Mechanism.....	5

## 1. Document Management

Document Reference	RSP-SSC-002
First Published	Dec 2017
Current Version Published	Nov 2025
Version	2.2
Document Type	Group Policy
Document Scope	All Raycap
Confidentiality Status	Public
Document Owner(s)	Chief Supply Chain and Sustainability Officer (CSCSO)
Document Reviewer(s)	Procurement Performance Taskforce
Document Approver(s)	CEO

## 2. Purpose and Scope

Raycap is committed to conducting its business with integrity and promoting responsible sourcing throughout its supply chain. This policy defines Raycap's commitment to identify, assess, and mitigate risks associated with minerals originating from conflict-affected and high-risk areas (CAHRAs) and to ensure transparency in the sourcing of minerals used in its products.

Although Raycap is not formally subject to any legal reporting obligations under the U.S. Dodd-Frank Act or the EU Conflict Minerals Regulation, the company voluntarily performs responsible-minerals due diligence across its supply chain to strengthen transparency, accountability, and ethical business conduct.

This policy applies to all Raycap entities worldwide and to all employees, contractors, and suppliers involved in the sourcing, manufacturing, or distribution of Raycap products. It covers minerals commonly referred to as critical or conflict-affected minerals, including but not limited to tin, tantalum, tungsten, and gold (3TG), as well as cobalt, mica, and other minerals identified under evolving international frameworks. The policy emphasizes responsible sourcing practices throughout the entire supply chain, particularly for materials that may originate from regions with heightened social, environmental, or human-rights risks.

Raycap aligns its approach with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and with relevant international frameworks promoting transparent and responsible supply chains.

## 3. Governance and Oversight

Ultimate responsibility for this policy lies with the Board of Directors, with formal approval overseen by the Chief Executive Officer (CEO).

To ensure effective implementation, oversight, and continuous improvement, Raycap has established the Procurement Performance Taskforce—a cross-functional body led by the Chief Supply Chain and Sustainability Officer (CSCSO) and comprising the ESG & Sustainability Manager, as well as the Procurement and Quality Managers from key supply-chain operations in Greece, Slovenia, and the United States.

The Taskforce plays a central role in driving procurement-related initiatives across the organization, including supplier engagement, performance improvement, risk assessment, and the integration of sustainability and compliance standards into procurement practices. It is also responsible for reviewing this policy, identifying improvement opportunities, and recommending updates to ensure continued relevance and alignment with Raycap's strategic objectives. The CSCSO regularly reports key developments, challenges, and opportunities to the CEO and Board of Directors.

This policy is reviewed at least annually to maintain its relevance, effectiveness, and alignment with evolving regulatory requirements and best practices. Revisions may be made based on management reviews, stakeholder input, or changes in the external operating environment.

## 4. Policy Statement

Raycap is committed to the responsible sourcing of minerals and will not knowingly procure minerals from sources that contribute to conflict, human rights abuses, or environmental harm.

Accordingly, Raycap will use its commercially reasonable best efforts to ensure its supply chain is free from conflict minerals and adheres to the following principles:

- **Supply Chain Due Diligence:** Raycap carries out reasonable country-of-origin inquiries and performs supply-chain due diligence following the processes set out in the OECD Due Diligence Guidance and other recognized international standards. This includes comprehensive supplier assessments to identify and manage high-risk suppliers of conflict minerals. Raycap aims to regularly assess its Tier 1 suppliers and progressively increase the proportion of critical suppliers providing verified smelter information or equivalent evidence of responsible sourcing.
- **Supplier Engagement:** Raycap works collaboratively with suppliers to ensure they understand and apply this policy, the company's commitment to responsible sourcing, and their obligation to uphold these principles through similar practices. This includes adherence to Raycap's Third-Party Code of Conduct and General Terms and Conditions of Purchase, for which Raycap aims to achieve full coverage across its supply chain.
- **Reporting and Disclosure:** Raycap is not legally required to report on conflict or critical minerals; however, the company voluntarily provides transparent information to interested stakeholders, including customers and regulatory bodies, upon request. Raycap also participates in voluntary disclosure initiatives related to cobalt, mica, and other minerals to promote responsible supply-chain practices. The company maintains a zero-tolerance approach to non-compliance and seeks continual improvement in the quality and completeness of supplier reporting.
- **Continuous Improvement:** Raycap is committed to continuously improving its due-diligence systems and will take corrective or preventive actions as necessary to address issues related to responsible-minerals sourcing. Where serious or repeated non-compliance with this policy is identified, Raycap may require suppliers to implement corrective-action plans within a defined timeframe. If the supplier fails to remediate the issue or if there is credible evidence of involvement in human-rights abuses, conflict financing, or other severe ethical breaches, Raycap reserves the right to suspend or terminate the business relationship. All such decisions are taken following a risk-based evaluation by the relevant departments.
- **Training and Awareness:** Raycap ensures that employees involved in the supply chain receive appropriate training on responsible-sourcing principles and will make best efforts to train new critical suppliers within their first year of engagement, followed by periodic refreshers.

## 5. Grievance Mechanism

We encourage all relevant stakeholders to report in good faith any suspected violations of this policy through the established channels, as outlined in our Whistleblower Protection Policies, Raycap's Code of Conduct, and Third-Party code of Conduct. We are committed to maintaining a safe and transparent reporting environment, ensuring strict confidentiality and strong protections against any form of retaliation for those who come forward.

Concerns or incidents related to this policy may be reported anonymously or with identification via the following dedicated reporting channels:

- ✉ [codeofconduct@raycap.com](mailto:codeofconduct@raycap.com) (General)
- ✉ [speakup@raycap.com](mailto:speakup@raycap.com) (For Raycap employees)
- ✉ [supplychaincompliance@raycap.com](mailto:supplychaincompliance@raycap.com) (For Third-Parties)

Employees may also use subsidiary-level or local reporting lines in accordance with regional whistleblowing regulations.

Raycap ensures that all reports undergo a prompt, thorough, and impartial investigation, with appropriate corrective actions taken as necessary to uphold ethical business practices. Depending on the severity of the violation, remediation efforts may involve risk mitigation, additional training, enhanced monitoring, temporary suspension, or termination of business relationships, as well as disciplinary or legal action where applicable. By embedding accountability at all levels, Raycap reinforces its commitment to ethical business conduct, respect for human rights, and responsible sourcing.

Third-parties are encouraged to contact [supplychaincompliance@raycap.com](mailto:supplychaincompliance@raycap.com) if they wish to seek further guidance on the application of this policy or provide feedback on areas of improvement.

# **Raycap**

**Raycap Global Group**  
[info@raycap.com](mailto:info@raycap.com)

