

## Responsible Minerals Sourcing Policy

### Scope

This Responsible Minerals Sourcing Policy applies to JP Sá Couto S.A. (referred as jp.ik) and to all its suppliers. It defines the requirements related to the sourcing of products, components, and materials that contain tin, tungsten, tantalum, gold (3TG) and cobalt, and clarifies the responsibilities of suppliers in cooperating with jp.ik in accordance with this Policy.

This Policy covers minerals sourced from Conflict-Affected and High-Risk Areas (CAHRAs), as defined by the OECD Due Diligence Guidance.

### General Guidelines

Minerals and metals play a critical role in modern economies and technologies. However, their extraction, processing, transport, and trade may be associated with significant adverse impacts, including human rights abuses, corruption, environmental harm, and the financing of armed conflict, particularly in Conflict-Affected and High-Risk Areas.

The sourcing of 3TG minerals has been widely recognized as a potential contributor to armed conflict and human rights violations. In addition, cobalt, while not legally classified as a conflict mineral under current 3TG regulations, is recognized by industry initiatives and international organizations as a high-risk mineral, due to documented risks related to child labor, unsafe working conditions, and lack of supply chain transparency, particularly in certain regions.

jp.ik is committed to the responsible and ethical sourcing of minerals, including 3TG and cobalt, used in its products. We do not support, contribute to, assist, or knowingly facilitate any form of armed conflict, human rights abuse, or unethical practices in our mineral supply chains.

jp.ik will not knowingly provide direct or indirect support to armed groups, public or private security forces, or other entities that illegally control, tax, or benefit from mining sites, transportation routes, processing facilities, or upstream actors in the mineral supply chain.

jp.ik maintains a comprehensive policy prohibiting corruption, bribery, and unethical business practices, and expects all suppliers and business partners to uphold equivalent standards.

### Due Diligence Framework

jp.ik implements due diligence procedures consistent with internationally recognized frameworks, including:

- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [Responsible Minerals Initiative \(RMI\)](#) guidelines and tools, including:
  - [Conflict Minerals Reporting Template \(CMRT\)](#) for 3TG.
  - [Extended Minerals Reporting Template \(EMRT\)](#) for cobalt.

Suppliers are expected to establish and maintain due diligence processes aligned with these frameworks and to cascade these expectations throughout their own supply chains.

jp.ik encourages suppliers to source 3TG and cobalt from responsible and audited smelters and refiners, and to support industry programs aimed at improving transparency and responsible practices in 3TG and cobalt supply chains.

## **Supply Chain Requirements**

Whenever feasible, jp.ik incorporates responsible mineral sourcing principles into supplier agreements and works collaboratively with suppliers to raise awareness and drive continuous improvement.

Suppliers are expected to:

- Adopt and communicate policies aligned with this Conflict Minerals and Cobalt Policy.
- Flow down these requirements to their sub-suppliers.
- Identify and assess the presence of 3TG and cobalt in supplied products.
- Use standardized reporting mechanisms (e.g., CMRT and EMRT);
- Provide accurate and complete information regarding mineral sourcing upon request.

jp.ik reserves the right to request supporting documentation, conduct assessments, or require corrective actions related to mineral sourcing practices. Suppliers are encouraged to participate in industry initiatives that promote responsible sourcing, traceability, and continuous improvement across global mineral supply chains.

## **Non-Compliance and Corrective Actions**

jp.ik's approach prioritizes long-term partnerships and sustainable solutions. Suppliers whose practices are found to be inconsistent with this Policy are expected to define and implement a corrective action plan within a reasonable timeframe (typically up to six months).

jp.ik reserves the right to:

- Monitor the implementation and effectiveness of corrective actions.
- Require additional supply chain assessments.
- Take further actions, including suspension or termination of the business relationship, in cases of persistent non-compliance.

## **Communication and Continuous Improvement**

jp.ik welcomes feedback and collaboration to strengthen responsible sourcing practices and broader sustainability performance. Questions or comments regarding this Policy may be directed to email: [info@jpik.com](mailto:info@jpik.com)