

GROUP RESPONSIBLE MINERALS SOURCING POLICY

The sourcing of certain minerals – such as tin, tantalum, tungsten, gold, and others – can be linked to conflict financing, human rights abuses, and weak governance in certain countries or regions. As a global telecommunications equipment manufacturer, we recognize our responsibility to ensure that our supply chain does not contribute to such arms, even though we are many tiers removed from the refiners and smelters that process these minerals. This policy sets out our commitment to responsible minerals sourcing, in line with internationally recognized standards, to promote ethical business conduct and sustainable supply chains, and to influence our suppliers to implement similar practices throughout their own supply chain. This policy should be read in conjunction with our **Group Sustainable Procurement Policy**.

Ekinops is committed to sourcing minerals responsibly and ensuring that our products do not contribute to conflict, human rights abuses, or other adverse impacts in the supply chain. We follow internationally recognized due diligence standards, in particular the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs). Through this approach, we will work to build transparent and ethical supply chains and to continuously improve our practices together with our suppliers and industry partners.

This policy applies to all our operations and products, as well as our **Suppliers Concerned**, worldwide. It covers the minerals commonly referred to as “3TG” (gold, wolframite, cassiterite, columbite-tantalite, and their derivative metals, which include tantalum, tungsten, and tin), as well as other minerals that are considered high-risk or are included in recognized industry reporting frameworks, such as cobalt, mica, lithium, nickel, and graphite. As standards evolve, we may extend the scope of this policy to additional materials where responsible sourcing concerns arise.

For the purpose of this policy, the term “**Suppliers Concerned**” refer to those suppliers who provide components, assemblies, materials, or manufacturing services that may contain, incorporate, or rely on the minerals covered by this policy. These are the suppliers expected to comply with the due diligence reporting requirements outlined below.

We are committed to implement a due diligence program consistent with the OECD Guidance. This includes maintaining strong management systems with clear governance, suppliers requirements, employee training, and grievance mechanisms ; identifying and assessing supply chain risks through data collection and mapping to smelters and refiners ; managing these risks by engaging with suppliers on corrective actions and prioritizing sourcing from audited and conformant facilities ; and ensuring transparency by publishing annual updates and disclosing our progress to stakeholders.

Suppliers Concerned are expected to commit to responsible sourcing and to adopt a written policy on minerals sourcing that is aligned with the OECD Guidance. They are required to provide complete and accurate reporting on the minerals contained in the materials or components they supply, using recognized industry templates such as the CMRT (Conflict Mineral Reporting Template) from the Responsible Mineral Initiative. Suppliers should take proactive measures to source from responsible smelters and refiners, address identified risk in a timely manner and cooperate fully with our requests for information or verification. **Suppliers Concerned** must also maintain all reporting data and supporting records for a period of five (5) years and provide such records upon request.

Oversight of this policy rests with our ESG Committee and Compliance Committee, supported by supply chain and procurement teams. Compliance with this policy is monitored through regular reviews, supplier engagement, and corrective actions tracking, with results reported to senior management.

Suppliers Concerned who fail to meet the requirements of this policy or to remediate identified risks may be subject to business suspension, removal from our approved vendor list, or termination of contracts.

Employees, suppliers, communities, and other stakeholders can report their concerns related to this policy and its implementation through the Ekinops grievance mechanism at : compliance@ekinops.com.

The management team is fully committed to the implementation of this **Responsible Minerals Sourcing policy** across the Group's operations and is putting in place the necessary means and conditions of its application.

Philippe Moulin CEO	Patrice Guegan VP Manufacturing	Alexandre Humbersot Group Procurement Director
		
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Ver.	Date	Summary of changes	Prepared by
1.00	27 th Oct. 2025	Original	Sébastien Bernard