

PSS Belgium NV – Conflict & Extended Minerals Policy

1. Introduction

PSS Belgium NV is committed to responsible, ethical, and sustainable sourcing across all materials used in our products and supply chains. This includes supporting international efforts to eliminate the use of minerals that finance armed conflict, contribute to human rights abuses, or originate from conflict-affected and high-risk areas (CAHRAs).

This policy covers **3TG minerals**—tantalum, tin, tungsten, and gold—as well as **Extended Minerals**, reflecting evolving regulatory expectations and industry best practices.

2. Our Commitment

PSS Belgium NV is committed to:

- Ensuring responsible sourcing of minerals throughout our supply chain.
- Avoiding materials that contribute to human rights abuse or armed conflict.
- Increasing transparency and traceability of mineral sources.
- Complying with relevant regulatory frameworks, including:
 - EU Conflict Minerals Regulation (EU 2017/821)
 - U.S. Dodd-Frank Act Section 1502 (where applicable)
 - OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

3. Extended Minerals

In addition to tin, tantalum, tungsten, and gold (3TG), PSS Belgium NV recognizes that global due diligence standards are expanding toward additional minerals associated with environmental, social, or governance (ESG) risks.

Extended Minerals may include—depending on market developments and customer expectations—materials such as:

- **Cobalt**
- **Mica**
- **Lithium**
- **Nickel**
- **Copper**
- **Natural rubber**
- **Rare earth elements**
- Other minerals identified by international organizations, NGOs, or customers as presenting heightened ESG risks

Our Approach to Extended Minerals

PSS Belgium NV commits to:

1. **Conducting risk-based due diligence** on extended minerals where there is reasonable concern about CAHRAs or ESG impacts.

2. **Requesting supplier disclosures** using industry-recognized templates when available (e.g., RMI Extended Minerals Reporting Template / EMRT).
3. **Encouraging suppliers** to source Extended Minerals from audited, responsible, or certified supply chains when such frameworks exist.
4. **Integrating emerging regulations and industry standards** into our sourcing processes as they continue to evolve.
5. **Working toward full supply chain transparency** for materials where due diligence tools and frameworks become widely adopted.

4. Supplier Requirements

To support responsible mineral sourcing, PSS Belgium NV requires all suppliers to:

- Maintain policies aligned with the OECD Due Diligence Guidance.
- Provide complete and accurate data for minerals used in supplied materials, including both **3TG** and **Extended Minerals** when requested.
- Use only smelters or refiners that are verified as conflict-free or conformant under recognized audit programs (e.g., RMAP).
- Take prompt corrective measures if risks of conflict-linked or unethical sourcing are identified.
- Cascade these requirements to sub-suppliers and subcontractors.

Suppliers that fail to meet these expectations may be subject to review, remediation plans, or reconsideration of the business relationship.

5. Responsible Sourcing Process

PSS Belgium NV operates a structured due diligence framework that includes:

- Identifying components and materials containing 3TG or Extended Minerals.
- Collecting supplier data using CMRT, EMRT, and similar tools.
- Assessing risks related to CAHRAs, smelter/refiner status, and supplier transparency.
- Engaging with suppliers to implement improvements or mitigate risks.
- Maintaining documentation for audit and compliance purposes.

6. Continuous Improvement

Responsible sourcing is a dynamic, collaborative process. PSS Belgium NV commits to:

- Monitoring changes in regulations, industry practices, and emerging mineral risks.
- Training procurement teams and suppliers when relevant.
- Supporting global initiatives that promote ethical sourcing and transparent supply chains.
- Periodically reviewing and updating this policy.

7. Reporting Concerns

Employees, suppliers, customers, and stakeholders are encouraged to report concerns related to mineral sourcing or supply chain ethics. Reports may be submitted through PSS Belgium NV's internal compliance channels or designated contact points.

8. Policy Governance

This policy is approved by senior management and applies to all global operations of **PSS Belgium NV**.

It is reviewed annually and published on our company website.