

# HIGH-RISK MINERALS POLICY

## PURPOSE AND SCOPE

Marshall Group is committed to ethical and sustainable business practices. We aim to source materials responsibly and work with suppliers who share our values. This includes addressing human rights, labor conditions, health and safety, and environmental protection issues. As part of this commitment, this policy addresses specific minerals that are sourced from conflict-affected and high-risk areas, which may pose significant social and environmental risks. High-risk minerals (which also includes minerals commonly named conflict-minerals) include tin, tantalum, tungsten, gold, mica, copper, cobalt, graphite (natural), lithium or nickel.

## COMMITMENT

To mitigate risks related to high-risk minerals, our aim is to avoid purchasing products containing minerals that contribute to conflicts or human rights abuses. We expect our suppliers to source these minerals from smelters or refiners certified by the Responsible Minerals Initiative (RMI)'s Responsible Minerals Assurance Process (RMAP) or other recognized programs. Additionally, we exercise due diligence on our supply chain, following the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, to ensure compliance with our policy and to promote responsible sourcing practices. By collaborating with governments, NGOs, industry associations, and our suppliers, we aim to contribute to sustainable solutions and positive change in the industry.

## RISK MANAGEMENT

### 1. Risk Assessment

To ensure responsible sourcing, we conduct risk assessments of each of our businesses to determine whether high-risk minerals are present in our products. We also assess the maturity of our business partners' minerals risk management approaches and processes. We prioritize business partners based on risk and where we have greater influence over product manufacturing.

### 2. Our Expectations

Our Suppliers shall comply with our Supplier Code of Conduct and this policy. They shall respond to our due diligence surveys, such as SAQs, and we expect that they

source minerals from RMAP-certified smelters or other trusted sources. Suppliers shall also have policies, due diligence frameworks, and management systems in place to ensure that all high-risk minerals used in our products are sourced responsibly.

### **3. Mitigation**

Marshall Group requires business partners to immediately rectify any high-risk minerals issues and work collaboratively with us to implement corrective measures. Suppliers are required to terminate relationships with supply chain actors that do not cooperate in necessary supply chain mapping, risk identification, or verification/audit activities and/or who are linked to high-risk issues and have not implemented appropriate mitigation measures. In addition to internal risk assessments, Marshall Group has established a channel for affected persons or whistleblowers to report concerns about mineral extraction, trade, handling, or export in conflict-affected or high-risk areas.

### **4. Third-Party Verification**

Suppliers are expected to source high-risk minerals from supply chain actors who have completed or are actively working towards completing responsible sourcing verifications or audits conducted by recognized third-party organizations.

### **5. Multistakeholder Initiatives**

Marshall Group engages with peers to foster a culture of responsibility and eliminate the use of high-risk minerals. Marshall Group encourages suppliers to participate in industry cooperation to eliminate the use of high-risk minerals and foster sustainable procurement methods.

### **6. Reporting**

Marshall Group will provide information on our website and other appropriate platforms such as our Sustainability Report about the steps taken to determine the source and chain of custody of any high-risk minerals found in our products, along with the outcomes of our due diligence process.

## **COMPLIANCE**

Marshall Group maintains the right to assess and review its suppliers to ensure they are adhering to Marshall Group's policies and contractual obligations. If Marshall Group identifies a supplier that is not meeting these standards, we will take the necessary steps to remedy the situation, which may include ending the supplier relationship if required.

## **QUESTIONS OR REPORTING CONCERNS**

In case of questions or guidance on compliance to the policy, or in cases of noncompliance, the Supplier shall contact Marshall at: [sustainability@marshall.com](mailto:sustainability@marshall.com).

**OWNERSHIP**

The CEO of Marshall Group AB has ownership of the policy and performs regular content and compliance reviews.

**UPDATES AND REVIEWS**

This policy shall be reviewed and updated every three years or as needed based on the recommendations of Marshall's VP of Sustainability and executive management.

Contact: [sustainability@marshall.com](mailto:sustainability@marshall.com)

**REVIEW AND UPDATE HISTORY**