

RESPONSIBLE SUPPLY CHAIN AND MINERALS SOURCING POLICY

With this policy NIS S.r.l. declares its commitment to start, to maintain, to improve and to encourage sustainable and responsible sourcing of materials that become part of its production. For this reason we are planning to develop a system that promotes the awareness to the main ethical and professional standards including the compliance with Section 1502 of the US Dodd-Frank Act, the Extended Mineral Policy, etc. that regulate the provision of minerals from an approved List, avoiding all the materials that can be extracted or processed in Conflict Affected and High-Risk Areas (CAHRA)¹, such as the Democratic Republic of Congo (“DRC”) and this may contribute to armed conflicts or human right abuses. In particular, the minerals tin, tungsten, tantalum, and gold (“3TG Minerals”) that are extracted or processed in certain sites and can contribute to armed conflict in DRC and its adjoining countries, have become commonly referred to as “conflict minerals.” Similar concerns exist with additional minerals identified as cobalt and mica.

Armed conflict may take a variety of forms, such as conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructures and widespread of violence. Such areas are often characterized by widespread of human rights abuse and violations of national and/or international law.

Our purpose is to raise the awareness of all our supply chain while supporting and encouraging Suppliers to responsible sourcing.

To pursue this goal, we ask to all our Suppliers to take a look at the link [Responsible Minerals Initiative](#) and complete the official files in Excel (CMRT, EMRT and PRI), to declare the presence or absence of these elements in their products, declaring their sources and checking the countries of origin, establishing a due diligence and preferring smelters and refiners that conform to the Responsible Mineral Sourcing program and to extend these requirements and expectations to all their sub-tier Suppliers.

If we determine that a Supplier in our supply chain violates one of these responsible sourcing requirements, we will endeavour to obtain an acceptable remediation of the violation, including without limitation directly communicating with Suppliers and making available compliance education and training. We may also reassess our business relationship with a Supplier if identified violations are not remedied. If sub-Suppliers refuse, we expect you consider alternate sourcing of 3TG and cobalt and mica. We expect also that your company directly contact these SORs requiring to conform to RMAP or similar third-party schemes.

NIS S.r.l. also asks to its Suppliers to comply with import/export rules and regulations to ensure that no parts or services provided to NIS S.r.l. come from sanctioned parties (including sanctioned countries):
[European Union sanctions](#) | [EEAS \(europa.eu\)](#)

Best regards,
CEO – Dr. Raffaele Maldi
NIS S.r.l.