

RESPONSIBLE MINERAL SOURCING POLICY

Version	Date	Notes
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INTRODUCTION

A.A.G. STUCCHI manufactures and markets products that may include components containing minerals sourced from conflict-affected and high-risk areas. The Company recognizes that the extraction, trade, processing and export of such minerals may be associated with significant potential negative impacts, including human rights violations, the financing of armed conflicts and environmental damage.

A.A.G. STUCCHI supports the fight against violence, human rights violations and environmental degradation linked to the extraction and trade of minerals originating from conflict-affected and high-risk areas, including the Democratic Republic of the Congo and neighboring countries, as well as other regions of the world characterized by instability, unsafe working conditions or risks of exploitation. Revenues derived from minerals originating from these areas may potentially finance, directly or indirectly, armed groups involved in local civil conflicts, resulting in serious social and environmental abuses.

A.A.G. STUCCHI is committed to rejecting any form of direct or indirect contribution to the financing of armed conflicts, forced or child labor, and negative impacts on human rights and the environment related to mineral extraction within its supply chain. The Company requires its suppliers to operate consistently with this commitment and to adopt appropriate measures to ensure that their own supply chains also comply with these principles, ensuring traceability, control and the timely reporting of any risks or critical issues.

PURPOSE

This Responsible Minerals Sourcing Policy (hereinafter the “Policy”) defines the approach of A.A.G. STUCCHI (hereinafter the “Company”) to the responsible sourcing of minerals, in accordance with Regulation (EU) 2017/821, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the reporting frameworks of the Responsible Minerals Initiative (RMI).

SCOPE OF APPLICATION

This Policy applies to:

- All Employees, Collaborators, Managers and Directors of the Company, as well as all Suppliers, Business Partners and any parties acting on behalf of the Company (hereinafter the “Recipients”).
- Minerals and materials included, from time to time, within the reporting tools of the Responsible Minerals Initiative (RMI), in particular the Conflict Minerals Reporting Template (CMRT) in its most recent version (hereinafter the “Minerals”). Currently, these tools include Tin, Tantalum, Tungsten and Gold, although the scope may evolve over time in line with RMI updates. All Recipients are therefore required to consult and apply the latest available version of the above-mentioned tool and to ensure transparency regarding the origin of materials throughout the supply chain.

PRINCIPLES AND COMMITMENT

A.A.G. STUCCHI is committed to conducting due diligence on the Minerals supply chain in accordance with the principles set out in the OECD Guidelines, with the objective of:

- Preventing and not contributing, directly or indirectly, to human rights violations;
- Avoiding any support to armed groups or illegitimate security forces;
- Combating corruption, extortion and improper payments within the supply chain;
- Preventing significant environmental impacts related to mineral extraction and trade.

Suppliers and their sub-suppliers must:

- Ensure documented traceability of sourced minerals and provide updated CMRTs (or equivalent documentation) when requested;
- Integrate the principles of this Policy into their internal procedures;
- Promote these requirements throughout their supply chain;
- Train personnel involved in purchasing and supply chain management;
- Cooperate with verifications, audits or document requests from the Company;
- Promptly report any risks or non-compliance identified within the supply chain.

CODE IMPLEMENTATION AND MONITORING SYSTEM

Compliance with this Policy is a fundamental requirement for collaborating with A.A.G. STUCCHI. The Company is committed to implementing, updating and disseminating this Policy to its employees and throughout the supply chain.

All Recipients are required to be aware of the Policy, apply its principles within the scope of their responsibilities, and report any risks or critical issues identified within the supply chain. For clarifications or questions regarding the application of the Policy or due diligence activities, the Company may be contacted at the following email address: info@aagstucchi.com

PROVISIONS AND MEASURES IN CASE OF VIOLATION

Violation of this Policy undermines the relationship of trust between the Company and the Supplier and may result in operational, legal and reputational consequences. In the event of identified risks or non-compliance, the Company may adopt the following measures depending on the severity of the issue and the level of cooperation from the supplier:

- Corrective Action Plan with defined objectives, responsibilities and deadlines;
- Enhanced monitoring and additional audits;
- Temporary suspension of supplies;
- Termination of the contractual relationship in the most serious cases or in the absence of cooperation.

The Company also reserves the right to seek compensation for any economic or reputational damages.

REPORTING AND INVESTIGATION

Any person among the Recipients who becomes aware of a possible violation of this Policy by another Recipient is requested to report it immediately to their Manager, who will contact the Company's Management.

Reports may also be submitted through the Whistleblowing channel made available by the Company, according to the procedures indicated in the relevant official documentation.

STATUS OF THE POLICY

This Policy forms an integral part of the Company's value system and ethical policies and defines the minimum standards of conduct that all Recipients are required to respect in carrying out their activities.

Where laws, regulations or local requirements impose stricter provisions than those contained in this Policy, such provisions shall prevail and must be applied by the Recipients, while ensuring consistency with the principles expressed herein.

The Company may periodically update this Policy to ensure its continuous alignment with applicable regulations, international best practices and the evolution of its ethical and sustainability objectives.

The updated version of the Policy is made available through the Company's official communication channels (e.g. website). This Policy, and all subsequent versions, are approved by the Board of Directors of A.A.G. STUCCHI.