

Responsible Minerals – Sourcing Policy

“Conflict Minerals”

1. Minerals originating from the Democratic Republic of the Congo (DRC) are sometimes mined and sold under the control of armed groups,
2. in order to “finance conflicts characterized by extreme violence.” Some of these minerals may enter the supply chains of products used around the world, including those in the electronics industry.

Tommy-Invest’s suppliers source and use conflict minerals from multiple sources worldwide.

As part of the company’s commitment to corporate responsibility and respect for human rights – both in our own operations and in our global supply chain – **Tommy-Invest’s goal** is to use tantalum, tin, tungsten, and gold in our products that do **not directly or indirectly finance or benefit armed groups in the DRC or neighboring countries**, while continuing to support responsible mineral sourcing in the region.

Tommy-Invest expects its suppliers to establish policies and due diligence measures that will enable us to reasonably ensure that the products and components supplied to us containing conflict minerals are **free from DRC conflicts**.

Furthermore, Tommy-Invest expects our suppliers to comply with the **Electronic Industry Citizenship Coalition (EICC) Code of Conduct** and to conduct their operations in alignment with Tommy-Invest’s supply chain responsibility expectations.

To support this policy, Tommy-Invest will:

- Provide – and expect our suppliers to cooperate in providing – due diligence information to confirm that the tantalum, tin, tungsten, and gold in our supply chain are “**conflict free**.”
- Collaborate with our suppliers and other stakeholders on industry-wide solutions to enable products that are **conflict-free with respect to the DRC**.
- Commit to transparency in the implementation of this policy by publishing regular reports on our progress for relevant stakeholders and the public.

Adopted: January 2025

Notes:

1. “Conflict minerals,” as defined by the **U.S. Securities and Exchange Commission (SEC)** rules, is a broad term that includes columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, or tungsten – regardless of whether these minerals finance conflicts in the DRC or neighboring countries.
2. **Dodd-Frank Act, Section 1502.**
3. “Free from DRC conflicts” means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups – as defined in SEC Rule 13p-1 under the U.S. Securities Exchange Act of 1934.
4. We use the term “conflict free” in a broader sense to refer to suppliers, supply chains, smelters, and refiners whose sources of conflict minerals did not, and do not, directly or indirectly finance or benefit armed groups in the DRC or neighboring countries.

Budapest, 07.01.2025

Tommy-Invest Kft.