

Zaptec Minerals Policy

This policy applies to all employees, workers, consultants, and other persons doing business with Zaptec ASA including all its wholly owned or controlled subsidiaries or majority joint ventures, its contractors, and its direct suppliers.

Minerals are critical for the technology needed for the green energy transition. Zaptec's mineral policy outlines our commitment and ways of working to promote responsible use of resources in our technology as part of our accountability for manufacturing our products with the outmost respect to people and the planet.

The issues connected to the minerals used in our products, include the following:

- High-risk minerals that are scarce and at risk of being depleted.
- Increasing amount of E-waste, which is one of the world's fastest-growing waste streams with a very low recycling rate.
- Human Rights violations and the funding of armed conflict, often referred to as 3TG minerals: tin, tantalum, tungsten, and gold.
- Extraction of minerals damages the environment by contamination and loss of ecosystems around open pit mines.

Zaptec recognizes deep-sea mining as a potential issue in the future. According to the United Nations Environment Program, financing of deep-sea mining activities cannot be viewed as consistent with the Sustainable Blue Economy Finance Principles¹. Zaptec will therefore continue to exclude use of minerals originating from Deep-sea mining until research proves DSM to be a safe way of sourcing minerals.

Our Commitment

Zaptec commits to respecting human rights and our planet. As high-risk minerals are present in our products, we will ensure that we are aware of and ready to handle risks and opportunities connected to these minerals. Zaptec will prioritize recycled minerals where possible, and work with our supply chain to continuously increase recycled and/or fair mined minerals in products.

Of specific minerals category, Zaptec has the following approach:

- **Conflict minerals:** Zaptec is committed to having measures in place to ensure the responsible sourcing of tin, tantalum, tungsten and gold.
- **Transition and Rare Earth (REE) minerals:** Zaptec is reliant on high-risk minerals such as transition minerals (e.g. nickel) and REE minerals (e.g. lanthanum, cerium). Our risk-based due diligence on these minerals will aid us in sourcing these high-risk minerals responsibly.

Zaptec will do its utmost to hold to these commitments. In case any wrongdoings are revealed or potential adverse impacts on human rights and decent working conditions, we will attempt to remedy the situation

through collaborative and mitigating efforts with our suppliers as per our human rights policy. If this is not possible, we will terminate our relationship with the supplier.

Our Approach

Transparency in our supply chain is essential to drive positive changes. This is challenging due to the complexity of electronic industries supply chains with several supplier tiers and different layers from mineral mines all the way to final assembly. Zaptec has direct relationships with tier 1 and 2 suppliers. To work with the rest of the supply chain we have the following measurements in place:

- Zaptec will continue to have a Due Diligence process corresponding to the OECD's due diligence guidance for conflict minerals from high-risk areas such as the Democratic Republic of Congo (DRC).
- Zaptec is a member of the Responsible Business Alliance (RBA) and Responsible Minerals Initiative (RMI), which enables us to gain transparency in our supply chain with audits and self-assessment questionnaires.
- Zaptec will continue work to finalize Minerals Roadmap in 2026, in which we map minerals present in our products and then create a risk-based analysis on the identified minerals. We will work together with our suppliers and the Responsible Minerals Initiative to ensure that our identified high-risk minerals are properly dealt with.
- Zaptec's requirements for minerals will be incorporated into our New Supplier qualification and supplier management processes, including agreements. We will engage with all suppliers that supply us with 3TG minerals. We do not refrain from sourcing from high-risk regions as this might damage the livelihood of legitimate miners. Instead of terminating contracts with suppliers with findings, we will strive to improve the social and environmental situation. In case compliance cannot be achieved, Zaptec will terminate the relationship with the supplier.
- We aim to include our minerals work in our yearly Human Rights due diligence.

Our expectations

We expect that our suppliers, partners, employees, and initiatives we are members of, are aware of our policy, and we work together to respect and meet our commitment to responsible sourcing of minerals.

As a member of the Responsible Business Alliance, we expect our suppliers to report transparently on their human rights efforts, to understand their impact and take due steps to ensure that human rights are expected in their supply chains, and to act in accordance with the EU Conflict Minerals Regulation.

References

¹Sustainable Blue Finance Principles: <https://www.unepfi.org/blue-finance/the-principles/>

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Approved by: Zaptec CEO Kurt Østrem