

Position on Responsible Sourcing of Minerals

We recognise that business enterprises must prevent or mitigate adverse impacts that are linked to their operations, products, or services by their business relationships. This responsibility exists over and above compliance with laws and regulations.

We are aware that in conflict-affected and high-risk areas (CAHRAs), companies involved in mining and trade of minerals have the potential to generate income, growth and prosperity, but might also cause significant adverse impacts, that cover:

- serious abuses associated with the extraction, transport or trade of minerals;
- direct or indirect support to non-state armed groups;
- public or private security forces;
- bribery and fraudulent misrepresentation of the origin of minerals;
- money laundering;
- payment of taxes, fees and royalties due to governments.

In particular, serious abuses associated with the extraction includes:

- any forms of torture, cruel, inhuman and degrading treatment;
- any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- the worst forms of child labour; other gross human rights violations and abuses such as widespread sexual violence;
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Also, direct or indirect support to non-state armed groups includes, but is not limited to, procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:

- illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain and/or;
- illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded and/or;

- illegally tax or extort intermediaries, export companies or international traders.

Based on this, we commit to promote sustainable mineral supply chains in accordance with *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas* and exercise due diligence as an on-going, proactive, and reactive process.

We have adopted a management process to this aim, and we commit to accordingly take reasonable steps and make good faith efforts to carry out due diligence in the supply chains of the following metals that are considered relevant to our company:

- Tin,
- Tungsten,
- Tantalum,
- Cobalt.

We engage our suppliers in transparent surveys to identify the risks related to the supply of tin, tungsten, tantalum, cobalt, and their compounds. When a risk is identified, as a downstream company we exercise our leverage over upstream suppliers to mitigate the risks.

In 2023 the company has planned to join the Responsible Minerals Initiative. Recognizing that due diligence is a process of gradual improvements, we plan to extend and enhance our commitment over the years.

For any further information and to apply the grievance mechanism, please contact duediligence@omcd.com.

Alberto Tedeschi
Member of the board

