CONFLICT MINERALS POLICY

POL/10.R0.040526

1. Purpose

As Politem, ensuring that raw materials used in our supply chain are sourced responsibly, preventing human rights violations, and avoiding support of illegal activities in conflict-affected areas are among our top priorities.
This policy defines our approach to the responsible sourcing of minerals, particularly those originating from conflict-affected and high-risk areas.

2. Scope

This policy covers;

- All raw material and semi-finished product suppliers
- Inputs that indirectly contain minerals
- Sub-suppliers.

It specifically includes the following minerals and their derivatives:

- Tin
- Tungsten
- Tantalum
- Gold

("3TG minerals")

3. Commitment

Politem:

- Does not contribute to mineral trade that finances armed groups in conflict areas.
- Applies zero tolerance for human rights violations (including child labor, forced labor, and poor working conditions).
- Supports transparency and traceability within the supply chain.

4. Supplier Obligations

Our suppliers are expected to meet the following requirements:

- Identify and document the source of minerals used in the products they supply.
- Conduct risk assessments regarding conflict minerals.
- Ensure necessary controls, including those covering sub-suppliers.
- Provide relevant declarations and documentation upon request.

5. Implementation and Due Diligence

Politem implements the following processes to manage conflict minerals risks:

- Supplier questionnaires and declarations (e.g., CMRT format)
- Risk-based assessment approach.
- Additional due diligence for high-risk suppliers.
- Third-party verification where necessary

These processes are conducted in alignment with internationally recognized OECD guidelines.

6. Risk Management and Actions

In case a conflict minerals risk is identified:

- A corrective action plan is requested from the supplier.
- If no improvement is achieved, the business relationship may be reviewed or terminated.
- Alternative sourcing options are evaluated.

7. Transparency and Reporting

Politem:

- Promotes transparency throughout the supply chain.
- Shares relevant information in line with customer requests.
- Conducts reporting where required

8. Continuous Improvement

- Suppliers are evaluated on a regular basis
- Policies and processes are updated
- Awareness and training activities are conducted

9. Compliance

This policy:

- Forms an integral part of supplier agreements
- Is expected to be acknowledged and accepted in writing by suppliers

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San. Dış Tic. A.Ş.
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Supplier
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