

## Responsible minerals policy

### Purpose and commitment

Aurajoki Oy is committed to responsible, transparent and ethical business practices. This policy explains how Aurajoki identifies, assesses and manages responsible minerals risks in its own operations and supply chain. The aim is to prevent sourcing minerals or metals whose extraction, processing or trade may be linked to financing armed groups, serious human rights abuses, forced labor, child labor, corruption or other severe misconduct.

Aurajoki works in metal surface treatment and steel structures. This policy applies especially to purchased raw materials, coatings, components, subcontracted services and other procurements where responsible minerals requirements may be relevant. This policy supports the Aurajoki Oy Code of Conduct and the company's sustainability, quality and environmental management practices.

Note: Aurajoki uses a risk-based approach. A supplier relationship is not ended automatically only because the supply chain is linked to a conflict-affected or high-risk area. The key is to identify risks, improve supply chain transparency, agree corrective actions and manage risks effectively.

### Scope

This policy applies to Aurajoki Oy procurement, business units, suppliers, subcontractors and other business partners when products, components, raw materials, coatings or services may require responsible minerals due diligence.

Scope category	Minerals and application principle
<b>Primary focus</b>	The so-called 3TG minerals: tin (Sn), tantalum (Ta), tungsten (W) and gold (Au).
<b>Extended scope when relevant</b>	Cobalt, mica, lithium, nickel, natural graphite, copper and any other minerals or metals required by customer expectations, regulation or risk assessment.

### Core principles

- We comply with applicable laws, regulations, contractual obligations and customer requirements.
- We do not accept human rights abuse, child labor, forced labor, bribery, corruption or the financing of armed groups in our supply chain.
- We require suppliers to provide honest, timely and sufficiently detailed information on the supply chain and mineral origin when requested.
- We expect suppliers to apply equivalent responsible minerals requirements to their own suppliers and subcontractors.
- Where relevant, we use recognized industry tools and templates such as CMRT and EMRT (or equivalent disclosure formats).

### Due diligence approach

- Responsibilities: Aurajoki assigns a responsible person or function to coordinate this policy, customer responses and any needed internal guidance.
- Risk exposure: We identify purchases, products, services and suppliers where responsible minerals requirements may apply, and we request information based on risk. In the risk assessment, we may use public sources such as the EU indicative list of Conflict-Affected and High-Risk Areas (CAHRAs).
- Information review: We review supplier responses, countries of origin, smelter/refinery/processor information and any gaps or red flags. We request clarification when needed.

- Risk mitigation: If we identify elevated risk, we agree corrective actions, monitor progress and, if needed, consider alternative sourcing.
- Records and communication: We keep relevant records and can provide customers, on request, a reasoned description of our policy and due diligence approach.

## **Supplier requirements**

- Comply with this policy, the Aurajoki Oy Code of Conduct and applicable laws and regulations.
- Provide up-to-date and truthful information, on request, about mineral or metal origin, smelters/refiners/processors used and the supplier's own due diligence processes.
- Keep appropriate records and be able to show how responsible minerals requirements are managed in the supplier's own supply chain.
- Apply equivalent requirements to the supplier's own suppliers and subcontractors.
- Notify Aurajoki without delay about material changes, identified risks or suspected misconduct that may affect supply chain responsibility.
- Participate in reasonable inquiries, questionnaires, audits or assessments when Aurajoki considers them necessary.

## **Risk management and consequences**

If a supplier or supply chain presents elevated or unacceptable risk, Aurajoki may request more information, require a corrective action plan, increase monitoring or use contractual measures. In serious or repeated cases, Aurajoki may suspend new orders, re-evaluate the supplier relationship or end the relationship in line with contract terms and applicable law.

## **Governance, reporting and review**

This policy is approved by Aurajoki Oy management. Procurement and business units apply the policy in their own processes. The HSEQ function (or another designated responsible person) coordinates policy maintenance, training and customer responses. Suspected breaches can be reported through Aurajoki's whistleblowing channel or other available reporting channels. This policy is reviewed at least once a year, or earlier if regulation, customer expectations or Aurajoki's risk profile changes significantly.