



RESPONSIBLE MINERALS SOURCING POLICY

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OBEL CİVATA SAN. VE TİC. A.Ş. is committed to maintaining ethical, labor, and environmental standards in its sector and to responsible resource use. OBEL CİVATA SAN. VE TİC. A.Ş. embraces its Responsible Mineral Sourcing Policy under the slogan “Keep the Future Alive.”

Definitions:

- **Conflict and High-Risk Areas (CAHRAs):** Regions characterized by armed conflict, widespread violence, or human rights violations; areas with weak or non-existent governance, security issues, and weak rule of law; places deemed dangerous due to civil war, insurgencies, or unstable political situations.
- **EMRT (Extended Minerals Reporting Template):** A reporting template developed by the Responsible Minerals Initiative (RMI). It is used to support due diligence practices in cobalt and mica supply chains. It helps companies identify the country of origin and processors of these minerals through their suppliers. It is currently not a mandatory compliance requirement but is a voluntary initiative aimed at increasing transparency.
- **CMRT (Conflict Minerals Reporting Template):** A reporting template created for 3TG minerals (Tin, Tantalum, Tungsten, Gold) under Section 1502 of the Dodd-Frank Act and EU Regulation 2017/821. Developed by the Responsible Minerals Initiative (RMI), it helps companies identify refiners and countries of origin in their supply chains. It is mandatory to ensure that conflict minerals do not financially support armed groups.
- **Conflict Minerals:** Refers to minerals and compounds extracted in the Democratic Republic of Congo's eastern region and neighboring countries, known as the “Conflict Zone.”

Conflict minerals include the following:

- Tantalum (Ta - Tantalum) **CMRT (Conflict Minerals Reporting Template)**
 - Tin (Sn - Tin) **CMRT (Conflict Minerals Reporting Template)**
 - Tungsten (W - Wolfram) **CMRT (Conflict Minerals Reporting Template)**
 - Gold (Au - Gold) **CMRT (Conflict Minerals Reporting Template)**
 - Cobalt **EMRT (Extended Minerals Reporting Template)**
 - Mica **EMRT (Extended Minerals Reporting Template)**
- } 3TG minerals

Additionally, **EMRT v.2.0 and the April 2025 Update on Newly Covered Minerals** includes the following:

- Copper
- Graphite - Natural
- Lithium
- Nickel

Some of these minerals can find their place in the product supply chain worldwide, including in the automotive sector.

In politically unstable regions, the trade in minerals can be used to finance armed groups, encourage forced labor and other human rights violations, and support bribery and money laundering.

- 1- As a matter of policy, it avoids knowingly purchasing any products, components, or materials containing conflict minerals that are not verified as “DRC Conflict-Free.” It does not purchase Tin (Sn), Tantalum (Ta), Tungsten (W), or Gold (Au) (the 3TG Minerals) directly from smelters or mines.
- 2- It implements a zero-tolerance policy against child labor, forced labor, and human rights violations.
- 3- Ensures that cobalt and mica minerals are sourced from legal and ethical sources.
- 4- It acts in accordance with the OECD Guidance on Mineral Supply Chains from Conflict-Affected and High-Risk Areas.
- 5- It is committed to the responsible sourcing of minerals and to not sourcing minerals from conflict-affected and high-risk areas (CAHRAs).
- 6- Although it is a private company and not subject to the SEC disclosure requirements of the Dodd-Frank Act, as part of its commitment to environmental compliance and human rights protection, it is determined to ensure that its products do not contain any “conflict minerals” (metals sourced from the Democratic Republic of Congo (DRC) and neighboring countries that contribute to conflicts there).
- 7- It commits to sending the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT) to customers who request support for the use of the CMRT and EMRT templates.
- 8- Expects its suppliers and business partners to comply with the following:
 - Collaborating with their own suppliers to verify the use of the aforementioned minerals and their potential sources of supply,
 - Working with their own suppliers that may pose potential risks to take action to mitigate and stop risks, or to terminate cooperation with suppliers following unsuccessful risk mitigation attempts,
 - Refrain from offering, promising, giving, or requesting bribes to conceal or alter the origin of minerals, and resist bribery incentives,
 - Commit to collaborating with suppliers, national or international government agencies, institutions, civil society organizations, and, if necessary, affected third parties to prevent or reduce the risks of negative impacts.

This policy serves as a guide for all employees, customers, and suppliers of OBEL CİVATA SAN. VE TİC. A.Ş., outlining the company's stance on conflict minerals.