Marszał®
MARSZAL L Ryszkowski sp. k.

SUPPLY CHAIN POLICY

for a responsible global supply chain of minerals
and metals from conflict-affected and high-risk areas

PD
2025.09.01

Recognizing the risk of significant adverse impacts that may be associated with the extraction, trade, processing, and export of minerals from conflict-affected and high-risk areas, and recognizing our responsibility to respect human rights and not contribute to conflict, we commit to adopting, widely disseminating, and including in contracts or agreements with suppliers the following policy on responsible sourcing of minerals from conflict-affected and high-risk areas as a common reference point for conflict-sensitive mineral sourcing practices and supplier risk awareness from the point of extraction to the end-user.

We commit to refraining from any activities that contribute to the financing of conflict and commit to complying with relevant UN resolutions imposing sanctions or, where applicable, national laws implementing such resolutions.

I. With regard to serious abuses related to the extraction, transport or trade of minerals:

1. When sourcing or conducting activities in conflict-affected and high-risk areas, we will not tolerate or benefit from, contribute to, assist or facilitate the commission of any other entity in any way the following acts:

- all forms of torture and cruel, inhuman and degrading treatment,
- any form of forced or compulsory labour which means work or the provision of services which are required of any person under penalty and which the person has not voluntarily volunteered to perform;
- the worst forms of child labour,
- other serious human rights violations and abuses, such as large-scale sexual violence,
- war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

II. With regard to serious fraud risk management:

2. We will immediately suspend or terminate cooperation with suppliers of raw materials if we determine that there is a reasonable risk that suppliers are sourcing from any entity that has committed serious abuses listed in point 1.

III. With regard to direct or indirect support to non-state armed groups:

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, processing or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, processing or export of minerals includes, m.in, the acquisition of, payments to, or otherwise the provision of logistical assistance or the provision of equipment to non-state armed groups or entities which:

- unlawfully control or otherwise control the transport routes, mineral trading points and upstream entities or operators upstream of the supply chain; or
- unlawfully impose taxes or extort money or minerals at mine access points, along transport routes or at points where minerals are traded, or
- unlawfully tax or extort money from intermediaries, exporting companies or international trading companies.

IV. With regard to risk management related to direct or indirect support to non-state armed groups:

4. We will immediately suspend or terminate cooperation with suppliers of raw materials if we determine that there is a reasonable risk that the suppliers are sourcing from or associated with any entity that provides direct or indirect support to non-state armed groups as defined in section 3.

V. With regard to public or private security forces:

5. We agree to eliminate, in accordance with clause 10, direct or indirect support for public or private security forces that unlawfully control mines, transport routes and entities operating at a higher level of the supply chain; unlawfully impose taxes or extort money or minerals at mine access points, along transport routes or at points where minerals are traded; or unlawfully tax or extort money from intermediaries, exporting companies or international trading companies.

6. We recognize that the role of public or private security forces in mines or surrounding areas or along transport routes should be solely to uphold the rule of law, including the protection of human rights, to ensure the safety of mine workers, equipment and facilities, and to protect mines or transport routes from interference with legitimate mining and trade.

7. Where we or any company in our supply chain contracts with public or private security forces, we undertake or will require the services of such armed forces in accordance with voluntary security and human rights rules. In particular, we will provide support or take steps to adopt a control policy to ensure that individuals or units of the security forces known to be responsible for gross human rights violations are not employed.

8. We will support efforts or actions to establish cooperation with central or local administrations, international organisations and civil society organisations to contribute to the development of workable solutions on how to improve transparency, proportionality and accountability of payments to public security forces for providing security.

9. We will support efforts or actions to establish cooperation with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular hand-mining miners where minerals in the supply chain are extracted by manual or small-scale mining, to the negative effects of the presence of security forces. public or private, on the premises of the mine.

VI. With regard to the risk management of public or private security forces:

10. In accordance with the company's specific position in the supply chain, we will promptly develop, adopt and implement a risk management plan together with raw material suppliers and other stakeholders to prevent or mitigate the risks associated with direct or indirect support to public or private security forces referred to in point 5 where we determine that such a reasonable risk exists. In such cases, we will suspend or terminate cooperation with raw material suppliers after unsuccessful attempts to mitigate risk within six months of the adoption of the risk management plan. If we identify a reasonable risk of activities that do not comply with points 8 and 9, we will react in the same spirit.

VII. With regard to bribery and misrepresentation of minerals:

11. We will not offer, promise, give or solicit any bribe, and we will not solicit bribes to conceal or alter the origin of minerals in order to mislead with respect to taxes, fees and royalties paid to governments for the extraction, trade, processing, transportation and export of minerals.

VIII. With regard to money laundering:

12. We will support efforts or take actions to contribute to the effective elimination of money laundering where we identify a reasonable risk of money laundering arising from the extraction, trade, transport or export of minerals related to the illegal imposition of taxes or extortion of minerals at access points to mines, along transport routes or at points where minerals are traded by suppliers of raw materials, or risks associated with such activities.

IX. With respect to the payment of taxes, fees, and royalties to governments:

13. We will ensure that all taxes, fees and royalties related to the extraction, trade and export of minerals from conflict-affected and high-risk areas are paid to governments and, in line with the company's position in the supply chain, we commit to disclosing such payments in accordance with the principles set out in the Extractive Industries Transparency Initiative (EITI).

X. With regard to managing the risks of bribery and misrepresentation of minerals, money laundering and the payment of taxes, fees and royalties to governments:

14. In line with the specific position of the company in the supply chain, we undertake to work with suppliers, central or local authorities, international organisations, civil society and, where appropriate, with third parties concerned, to

improve and track performance in order to prevent or mitigate the risk of adverse impacts by taking measurable action within a reasonable timeframe. We will suspend or terminate cooperation with raw material suppliers after unsuccessful attempts to mitigate risk.

This Supply Chain Policy complies with the requirements of Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for EU importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas and has been developed in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains for Minerals from conflict-affected and high-risk areas.

The effective implementation of the Supply Chain Policy and the functioning of the due diligence system (SNS) is supported by the quality management system implemented and certified by Marszal L.Ryszkowski Sp. k ., in accordance with the requirements of the international standard ISO 9001:2015.

Marszal L.Ryszkowski Sp. k. undertakes to meet the applicable requirements and to continuously improve the effectiveness of the implemented due diligence system, involving employees, associates and suppliers involved in the supply chain of minerals and metals in this process.

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