



SOCIETATEA COMERCIALA
EL-CO S.A.

Nr. ord. reg. com/an J14/16/1991
Cod unic de inregistrare: RO557274

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Nr. certificat : 2516
ISO 14001:2015



Nr. certificat : 2536
ISO 9001:2015

Responsible Mineral Sourcing Policy

Effective Date: 01.01.2025

Approved By: General Director

Version: 1.0

1. Purpose

El-Co S.A. is committed to conducting business ethically, responsibly, and in accordance with all applicable laws and international standards. This Responsible Mineral Sourcing Policy outlines the principles and practices that guide how we source minerals used in our products, with the goal of ensuring that our supply chain does not contribute to human rights abuses, environmental harm, or the financing of armed conflict.

2. Scope

This policy applies to:

- All minerals used in products manufactured or supplied by El-Co S.A., including but not limited to **tin, tantalum, tungsten, gold (3TG), cobalt, lithium, nickel, graphite, and rare earth elements**.
 - All suppliers, subcontractors, and business partners who provide materials, components, or finished products to El-Co S.A.
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3. Guiding Standards and Regulations

El-Co S.A.'s approach to responsible sourcing is aligned with internationally recognized standards, including:



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- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas**
 - **UN Guiding Principles on Business and Human Rights**
 - **International Labour Organization (ILO) Conventions**
 - Applicable regional regulations governing mineral sourcing (e.g., EU Conflict Minerals Regulation, Dodd-Frank Section 1502, national due diligence laws where relevant)
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4. Our Commitments

El-Co S.A. commits to:

4.1 Ethical and Legal Sourcing

- Source minerals only from suppliers that comply with international human rights, labor, and environmental standards.
- Avoid minerals that may finance conflict, fuel corruption, or contribute to human rights abuses.

4.2 Supply Chain Transparency

- Map our mineral supply chain to the greatest extent practicable.
- Identify smelters and refiners used in our supply chain and encourage the use of **audited, responsible smelters/refiners** (e.g., RMI conformant).

4.3 Due Diligence

- Conduct risk-based due diligence in accordance with the OECD Five-Step Framework.
- Require suppliers to provide complete and accurate data using recognized reporting templates (e.g., RMI's CMRT/EMRT).

4.4 Risk Assessment and Mitigation

- Assess potential risks such as forced labor, child labor, unsafe working conditions, corruption, and environmental damage.
- Engage with suppliers to mitigate identified risks; if a supplier fails to take corrective action, El-Co S.A. may suspend or terminate the business relationship.



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4.5 Continuous Improvement

- Support initiatives that improve responsible mineral sourcing practices across global supply chains.
 - Provide internal training and support to suppliers to enhance compliance.
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5. Supplier Requirements

All suppliers to El-Co S.A. must:

1. **Implement their own responsible mineral sourcing policy** consistent with this document and the OECD guidelines.
2. **Avoid sourcing minerals from conflict-affected or high-risk areas** unless due diligence demonstrates responsible practices.
3. **Participate in El-Co S.A.'s due diligence assessments** and provide complete and timely data.
4. **Cooperate with audits or assessments** conducted by El-Co S.A. or third-party organizations.
5. **Report immediately** any potential human rights violations or supply chain risks.

Failure to meet these requirements may result in corrective action plans, suspension, or removal from El-Co S.A.'s approved supplier list.

6. Grievance Mechanism

El-Co S.A. encourages employees, suppliers, stakeholders, and external parties to report concerns related to mineral sourcing through our confidential grievance channels:

- **Email:** office@el-co.ro

All reports will be reviewed promptly and investigated in accordance with our internal procedures.



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7. Governance and Accountability

Responsibility for implementing this policy lies with:

- **Sustainability/Compliance Department:** Oversight of due diligence processes and supplier engagement.
- **Procurement Department:** Integration of responsible sourcing requirements into purchasing decisions.
- **Executive Management:** Policy approval and ensuring adequate resources for effective implementation.

El-Co S.A. will review this policy annually and update it as necessary to maintain alignment with evolving laws, standards, and industry best practices.

8. Public Disclosure

El-Co S.A. will publicly disclose relevant information about our due diligence efforts and progress in responsible mineral sourcing through sustainability reports or our corporate website.
