

ProDVX Conflict Minerals Policy

Version: 1.0

Status: Final

1. Purpose

ProDVX is committed to responsible business practices and responsible sourcing throughout its supply chain.

This Conflict Minerals Policy outlines our approach to addressing risks associated with the sourcing of minerals that may contribute to conflict, human rights abuses or other adverse impacts in conflict-affected and high-risk areas.

This policy is informed by the principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2. Scope

This policy applies to ProDVX products and relevant business relationships within our supply chain.

As ProDVX sources parts and products from manufacturers and other suppliers, our ability to obtain information about the origin of minerals depends in part on the information and cooperation provided by these parties.

We aim to work with our suppliers to improve supply chain transparency and address relevant risks.

3. Conflict Minerals

This policy focuses on the following minerals, commonly referred to as 3TG:

- Tin
- Tantalum
- Tungsten
- Gold

These minerals may originate from conflict-affected and high-risk areas. Their presence in a product does not automatically indicate that the minerals were sourced irresponsibly. The circumstances and risks associated with their sourcing must be considered.

4. Responsible Sourcing Commitment

ProDVX supports responsible mineral sourcing and seeks to avoid contributing to conflict, serious human rights abuses or other adverse impacts through its business relationships.

We expect our suppliers to act responsibly and to make reasonable efforts to understand the origin of relevant minerals in the products they supply to ProDVX.

Where relevant, we encourage suppliers to align their sourcing practices with internationally recognised standards and due diligence frameworks.

5. Supplier Engagement and Information Requests

ProDVX seeks to obtain relevant information from its manufacturers and suppliers to improve visibility into the sourcing of 3TG minerals in its products.

We request relevant supplier documentation where appropriate, which may include Conflict Minerals Reporting Templates (CMRTs), information about smelters and refiners, and statements concerning responsible mineral sourcing.

We review the information received to the extent reasonably possible and follow up with suppliers where clarification or additional information is needed.

6. Risk Assessment and Corrective Actions

Where relevant information becomes available, ProDVX will consider identified risks and determine whether further clarification or action is appropriate.

If credible concerns regarding irresponsible mineral sourcing are identified, we may engage with the relevant supplier to request additional information, clarification or corrective measures.

Depending on the circumstances and the supplier's response, further measures may be considered.

7. Continuous Improvement

ProDVX recognises that responsible mineral sourcing requires ongoing attention and cooperation throughout the supply chain.

We aim to improve our approach through supplier engagement, the collection of relevant documentation and periodic review of this policy.

8. Policy Review

This policy will be reviewed periodically and updated where appropriate to reflect developments in applicable requirements, recognised guidance and ProDVX's supply chain practices.

9. Reference

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. https://www.oecd.org/en/publications/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_g1g65996.html

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