



**Zoppas Industries**  
*Heating Element Technologies*

## Responsible Sourcing of Minerals Policy

Zoppas Industries Heating Element Technologies, hereinafter "ZIHET", is committed to being a responsible employer and a good corporate citizen by adopting policies and corporate conduct aimed at enhancing the financial, environmental, and social value of its products, processes and supply chain.

We recognize that extracting, trading, handling, and exporting minerals from conflict-affected and high-risk areas can have serious negative impacts. Acknowledging our responsibility to uphold human rights and prevent conflict, ZIHET is formalizing its commitment to responsible mineral sourcing with a policy aimed at achieving a completely conflict-free supply chain.

The negative impacts of a company's operations may result from a company's own activities or its relationships with third parties, including suppliers and other entities in the supply chain. ZIHET commits to refraining from any action that contributes to the following adverse impacts related to

- Serious abuses associated with the extraction, transport or trade of minerals;
- Direct or indirect support to non-state armed groups;
- Public or private security forces;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Money laundering;
- Payment of taxes, fees and royalties due to governments;

and related to the sourcing of the materials and articles containing the following minerals and their compounds (hereinafter "minerals"):

Tantalum

Tin

Tungsten

Gold

Mica

Cobalt

ZIHET complies with the above commitment by implementing a due diligence process as outlined in the following steps based on the principles of the OECD "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas":

Establish strong company management systems:

- The Policy on "Responsible Sourcing of Minerals" is made publicly available
- Due Diligence operations accountability is identified in the company management system
- Evidences from the relevant Suppliers are collected and reviewed annually
- Relevant suppliers are required to adhere to the same due diligence principles as specified in the "Supplier Code of Conduct"
- A company-level grievance mechanism is made available to the public

Identify and assess risk in the supply chain:

- Minerals origin is mapped and reviewed annually by collecting evidences from the relevant suppliers and referencing to the smelters' or refiners' qualification status by the Responsible Mineral Initiative (RMI)

Design and implement a strategy to respond to identified risks:

- Identified risks and related risk management plans are reported to the designated senior management of the company;
- Undertake additional fact and risk assessment for risk requiring mitigation, or after a change of circumstances

Report on supply chain due diligence:

- Results on the Responsible Minerals Sourcing due diligence process are publicly reported.

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