

March 2022

## CONFLICT MINERALS POLICY

US legislation and OECD due diligence guidelines currently define Conflict Minerals as cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold (or derivatives of these minerals), which are commonly referred to as 3TG, as well as Cobalt and Mica. This policy shares our approach to managing Conflict Minerals in line with legal requirements and international good practice.

Swissbit constantly strives to comply with all applicable laws and commits to work towards improving traceability of Conflict Minerals to support responsible sourcing. We have implemented measures in conformance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) and support the ideas of the Responsible Minerals Initiative (RMI).

Like the majority of companies using these six minerals, Swissbit is not a direct purchaser and is several tiers downstream from the smelters or refiners of these minerals. As a result, we rely on processes developed by the RMI and on information received from our in-scope direct suppliers relating to sources of supply.

Swissbit requires that suppliers whose products contain Conflict Minerals to assist by providing information throughout their supply chain using the latest RMI's Conflict Minerals Reporting Template (CMRT) and Extended Minerals Reporting Template (EMRT). Swissbit expects suppliers to take similar measures with their suppliers to ensure compliance throughout their supply chain and to have policies and due diligence measures in place that will enable us to assure that our products are conflict free.

In-scope direct suppliers with CMRs containing smelters or refiners (SORs) that are not conflict free or progressing towards it are asked to remove those SORs from their supply chain or to encourage their participation in third party audit programs.

We are taking action to increase transparency, ensure responsible procurement by our suppliers, and support positive change. Swissbit is committed to source its components and parts from suppliers that respect human rights, integrity and environmental regulations. We have put measures in place to ensure our program continues to grow and develops in line with emerging legal requirements and stakeholder interests.