Conflict Mineral Policy

Introduction

STARTEAM, together with its subsidiaries, is committed to corporate responsibility and to respecting human rights in its own operations and in its global supply chain. STARTEAM is committed to complying with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk-Areas.

As part of that commitment, STARTEAM will seek to identify, reduce and ultimately eliminate the use in its products of conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo and surrounding countries.

Scope

This policy and associated procedures apply to all directors, staff and contractors working for the company.

Policy

STARTEAM is concerned that minerals from the Democratic Republic of the Congo (DRC) and surrounding countries might serve as funding sources for armed groups causing human rights abuse, environmental destruction and conflicts in the area that encourage their activities.

Based on this concern, as for four minerals (gold, tantalum, tungsten, tin) named in Article 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, STARTEAM has made it a policy “to refrain from knowingly procuring products that may contain minerals serving as funding sources for armed groups (conflict minerals)” in order to avoid encouraging conflicts through our procurement activities.

In order to ensure the full compliance of the policy, STARTEAM will act in accordance with the “OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict- Affected and High-Risk Areas” in implementing due diligence for minerals on its supply chain with respect to their countries of origin and distribution processes.

STARTEAM will be cautious that the two minerals, tin and gold, used in its products have nothing to do with the conflicts in DRC and surrounding countries and, at the same time, will not result in the restriction of exports from those countries. In line with the above policy, STARTEAM will maintain the following efforts:

To explain to its suppliers the policy upheld by STARTEAM with regard to the conflict minerals and to identify the status of use and refiners of the conflict minerals through investigations based on the “Conflict Minerals Reporting Template (RBA)”.

In order to ensure that minerals will be procured only from refiners certified under the CFS Certification Program by the RMI (Responsible Minerals Initiative), STARTEAM will encourage all refiners we use along our supply chain to obtain the CFS certification.

If, in the future, any more effective method for eliminating the conflict minerals is introduced, STARTEAM will adopt such method together with our suppliers.

For questions and further Information, please contact your local Sales office
https://starteam.global/contact-us/

Responsibility and Review

This Conflict Mineral Policy is the responsibility of the Management of STARTEAM, the last update was in May 2024 and will be reviewed annually.