
Owasys Conflict Minerals Policy

In support of global responsible sourcing, Owasys is committed to ethical practices and compliance with all applicable laws and regulations. While we do not source these metals directly, they may exist in the products we source. We are therefore committed to ensuring that conflict minerals used in the manufacture of our products do not directly or indirectly fund violence or human rights abuses in the Democratic Republic of the Congo or adjoining countries.

Conflict minerals are those minerals regulated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. They include columbite-tantalite, also known as coltan (and its derivative tantalum); cassiterite (and its derivative tin); wolframite (and its derivative tungsten); and gold.

We are therefore committed to working with our suppliers to responsibly source the materials and components we use in manufacturing our products which may contain these minerals.

In order to assist its customers' requirements to comply with the above regulations relating to conflict minerals, Owasys requires written evidence of their due diligence documenting those raw materials, (specifically gold, tin, tantalum, and tungsten) supplied to user in the Manufacture of Owasys products do not originate from mining or smelting operations in the Conflict Region.

In addition, we require the following from our suppliers:

- To source materials from socially responsible sub-tier suppliers and manufacturers.
- To assist in complying with regulations related to conflict minerals and to provide all necessary declarations.
- To undertake reasonable due diligence within their supply chain to determine the origin of the conflict minerals, including developing policies and management systems preventing the use of conflict minerals or derivative metals sourced from mines that directly or indirectly finance armed groups through mining or mineral trading in the DRC or any adjoining country, and to pass these requirements along to their sub-tier suppliers and require them to do the same with lower tiers of suppliers.

Owasys expects its suppliers to adhere to the Responsible Business Alliance Code of Conduct and source only from Active or Conformant refiner/smelters as defined by the Responsible Minerals Initiative (RMI) <http://www.responsiblemineralsinitiative.org>.

Owasys also follows industry guidelines to source Cobalt responsibly and complies with all (EU) /2017/821 legislation on importation of Conflict Minerals into Europe.

Owasys and our suppliers do not knowingly use any metals originating from Conflict Mines.

Owasys regularly questions our supply chain to ensure these Conflict Metals are not used.

Owasys is committed to working with our customers and our suppliers to ensure effective implementation of this legislation.

Javier Gurtubay

Managing Director

16th May 2024