EURI COMPANY

Responsible Minerals Sourcing Policy

Tin / Tantalum / Tungsten / Gold

Our commitment

Euri Company is committed to responsible minerals sourcing and respect for human rights throughout our global supply chain. This policy applies company-wide to tin, tantalum, tungsten and gold (3TG) used in our products, components and materials, including lighting and plumbing products.

Our policy is to prioritize sourcing 3TG from suppliers that demonstrate responsible sourcing practices through appropriate supply-chain due diligence and supporting documentation. We will not knowingly source minerals that finance armed conflict or contribute to serious human rights abuses. Our approach addresses risks in the Democratic Republic of the Congo, adjoining countries, and other conflict-affected and high-risk areas worldwide.

Responsible sourcing principles

Our approach is guided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Annex II risks. These include serious human rights abuses, support to non-state armed groups, abuses by public or private security forces, bribery and misrepresentation of mineral origin, money laundering, and nonpayment of taxes, fees and royalties due to governments.

Requirements for suppliers

Suppliers must provide a current, accurately completed Conflict Minerals Reporting Template (CMRT), with a clearly defined scope, at least annually and upon request. They must identify applicable products and known smelters and refiners, provide available origin and recycled or scrap information, disclose unknowns, and supply supporting records. Suppliers must promptly report material sourcing changes or identified risks, cooperate with follow-up inquiries, and correct incomplete or inconsistent information.

Due diligence and review

Euri will review supplier sourcing information against this policy, assess identified risks and seek clarification or supporting documentation where needed. Our due diligence will be proportionate to our role in the supply chain and will support accurate customer reporting.

Corrective action and escalation

Euri will work with suppliers to address incomplete information and sourcing concerns, monitor corrective actions, and escalate unresolved issues to management. Depending on the nature and severity of the risk, we may suspend or discontinue affected sourcing relationships. Serious human rights abuses or support to non-state armed groups will prompt immediate suspension or discontinuation of the implicated source.

Transparency and accountability

Euri will make this policy publicly available and provide customers with available sourcing information, including CMRT responses and supporting data upon request. We will communicate known limitations accurately, protect confidential information, and comply with applicable sourcing and disclosure requirements.

Management will oversee implementation and periodically review this policy and our sourcing practices. Employees, suppliers and other stakeholders may raise responsible sourcing concerns through their Euri contact without retaliation for good-faith reports.