



CONFLICT MINERALS POLICY

Purpose

EPC is committed to responsible sourcing and ethical business practices. We recognize the risks associated with conflict minerals—tin, tantalum, tungsten, and gold (3TG)—that may originate from regions where mining contributes to human rights abuses, including the Democratic Republic of the Congo (DRC) and adjoining countries. Our goal is to ensure that our products do not directly or indirectly finance armed conflict or human rights violations.

Scope

This policy applies to all EPC Power operations, suppliers, and partners involved in the sourcing, procurement, and use of materials containing conflict minerals. We expect our suppliers to uphold similar standards and actively participate in responsible sourcing initiatives.

Commitment to Responsible Sourcing

We are committed to:

- Conducting due diligence in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.
- We align our expectations to address risk issues in accordance with the regulations of DF 1502 designated high risk areas of the DRC and covered countries as well as the EU regulations CARHAs.
- Through the engagement with our suppliers, we seek to identify the materials sources of origin in order to assess risks associated with our value chain.
- Through this process our goal is to work with suppliers to communicate any risk issues uncovered and prioritize those sources which have completed a validated audit through the RMAP program.

Our efforts are to uncover all the materials sources of origin through working with our suppliers. We request this information by providing CMRTs for the legislative "Conflict Minerals" as well as the EMRT for additional materials.

Supplier Expectations

We expect our suppliers to:



- Implement policies and due diligence procedures to ensure responsible sourcing of 3TG minerals.
- Provide transparency in their mineral supply chains by submitting CMRTs and other documentation upon request.
- Engage with smelters and refiners that are validated as conflict-free by industry-recognized initiatives.
- Work with us to address any identified risks and take corrective actions if necessary.

Compliance and Continuous Improvement

We will periodically review and update our conflict minerals program to align with evolving regulations and industry best practices. We encourage open collaboration with suppliers, industry groups, and stakeholders to enhance responsible sourcing efforts.

Failure to comply with this policy may impact a supplier's business relationship with EPC Power Corp., up to and including termination of contracts.

Reporting Concerns

EPC Power Corp. is committed to addressing reported concerns and taking appropriate corrective action when necessary. Employees, suppliers, and other stakeholders are encouraged to report any suspected violations of this policy through [EPC's compliance reporting channel](#) or by calling:

- USA: (833) 207-0073
- Finland: 0800 418646

Reports may be submitted anonymously and will be treated with strict confidentiality to the extent permitted by law. We uphold a zero-tolerance policy for retaliation against individuals who report concerns in good faith.