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|-------------------------------------------------------------------------------------------------------------------------------|----------|----------------|-------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| <br>CORPORATE POLICY<br>Proprietary Document |          |                | Document Name<br><br>KYOCERA AVX Components Corporation<br>Responsible Minerals Sourcing Policy | Changes from Last Revision<br><br>Revised Conflict Minerals Policy<br>Updated company name |
| Rev.                                                                                                                          | Date     | Document Owner | Doc. No: GMSCC-PO-003                                                                           | Page 1 of 4                                                                                |
| 3                                                                                                                             | 01/28/25 | S. Nandikoor   | Reviewed & Approved: Signature(s) on file                                                       | Distribution: KAVXNet                                                                      |

## I. PURPOSE

The purpose of this policy establishes the KYOCERA AVX Components Corporation (KAVX) corporate requirements with applicable mineral sourcing laws, regulations and related KAVX procedures.

KAVX is dedicated to sourcing minerals in a way that promotes ethical practices, respects human rights, complies with global regulations, and supports sustainable development.

Sourcing of minerals can have significant economic, social, and environmental impacts, particularly when those minerals are extracted from conflict-affected and high-risk areas.

This revised version broadens the policy by incorporating detailed supplier audits, enhanced due diligence practices, and capacity-building initiatives. It emphasizes sustainability by aligning with the Environment, Health and Safety (ESG) principles. Additionally, it strengthens transparency and collaboration while establishing robust grievance mechanisms to address concerns effectively.

## II. SCOPE

This policy applies to all materials and components procured, manufactured, or sold by KAVX, as well as to all suppliers and business partners within our global supply chain.

## III. RELEVANT DOCUMENTS

GMSCC-PR-001 KAVX Responsible Minerals Sourcing Procedure

## IV. DEFINITIONS

N/A

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|------|----------|----------------|-------------------------------------------|-----------------------|
| Rev. | Date     | Document Owner | Doc. No: GMSCC-PO-003                     | Page 2 of 4           |
| 3    | 01/28/25 | S. Nandikoor   | Reviewed & Approved: Signature(s) on file | Distribution: KAVXNet |

## V. POLICY

### Principles

#### 1. Compliance with Applicable Laws and Standards

KAVX complies with all applicable local, national, and international laws and regulations regarding responsible mineral sourcing, including but not limited to Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, the EU Conflict Minerals Regulation (EU 2017/821), and relevant Organization for Economic Cooperation and Development (OECD) Guidelines. We also monitor and align with emerging standards and practices in mineral sourcing to ensure ongoing compliance.

#### 2. Commitment to Conflict-Free Minerals

We strive to ensure that the tin, tantalum, tungsten, gold (3TG) and cobalt used in our products are responsibly sourced and do not directly or indirectly finance armed conflict or human rights abuses in conflict-affected and high-risk areas or any other areas in the world. We actively support initiatives that promote conflict-free sourcing and encourage the development of conflict-free supply chains.

#### 3. Due Diligence

KAVX implements a comprehensive due diligence process based on the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This process includes:

- Identifying and assessing risks in our supply chain through rigorous risk mapping and analysis.
- Requiring suppliers to complete detailed due diligence questionnaires to validate their sourcing practices.
- Conducting supplier audits and evaluations to ensure alignment with responsible sourcing practices.
- Encouraging suppliers to source from smelters and refiners validated as conformant with recognized industry standards, such as the Responsible Minerals Assurance Process (RMAP) and RMI <https://www.responsiblemineralsinitiative.org/>
- Developing and implementing risk mitigation plans for suppliers not meeting compliance expectations.

| Rev. | Date     | Document Owner | Doc. No: GMSCC-PO-003                     | Page 3 of 4           |
|------|----------|----------------|-------------------------------------------|-----------------------|
| 3    | 01/28/25 | S. Nandikoor   | Reviewed & Approved: Signature(s) on file | Distribution: KAVXNet |

#### 4. Transparency and Reporting

We are committed to transparency in our mineral sourcing practices and regularly disclose our efforts and progress in responsible mineral sourcing. This includes:

- Ensuring compliance with respective countries' disclosure requirements and maintaining up-to-date records of our supply chain activities.
- Providing detailed documentation to relevant stakeholders upon request, including customers and regulatory authorities.

#### 5. Collaboration and Continuous Improvement

We work closely with industry initiatives, stakeholders, and suppliers to promote responsible mineral sourcing and drive continuous improvement throughout our supply chain. This includes:

- Participating in industry-wide programs, such as the Responsible Minerals Initiative (RMI), to enhance traceability and accountability.
- Supporting capacity-building efforts for suppliers to improve their due diligence processes.
- Engaging in multi-stakeholder dialogues to address systemic challenges in the minerals supply chain.
- Encouraging innovation in traceability technologies and practices to enhance supply chain transparency.

### Supplier Expectations

KAVX requires all suppliers to adhere to the following:

- Comply with our Responsible Minerals Sourcing Policy and all applicable regional and international regulations.
- Conduct their own due diligence on the source and chain of custody of 3TG minerals and cobalt and provide relevant documentation upon request.
- Source minerals only from smelters and refiners that are validated as conformant with recognized industry standards as well as current trade sanctions internationally.

| Rev. | Date     | Document Owner | Doc. No: GMSCC-PO-003                     | Page 4 of 4           |
|------|----------|----------------|-------------------------------------------|-----------------------|
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- Disclose any identified risks or non-conformance issues and cooperate with KAVX to address and resolve these issues.
- Provide timely and accurate data for reporting and compliance purposes.

## Grievance Mechanism

KAVX encourages stakeholders, including employees, suppliers, and external parties, to report concerns related to our mineral sourcing practices through our compliance portal <https://www.kyocera-avx.com/contact-us/reporting-misconduct/>. All reports will be reviewed and addressed in a timely and transparent manner. Stakeholders can submit grievances through our dedicated reporting platform or by contacting our compliance team directly.

## Commitment to Sustainability

This policy is part of KAVX's broader commitment to environmental, social, and governance (ESG) principles. We believe that by sourcing minerals responsibly, we can contribute to a more sustainable and equitable global economy. Our efforts include aligning with the global regulations, particularly those related to responsible consumption and production, decent work, and economic growth.

## Review and Updates

This policy will be reviewed annually and updated as necessary to reflect changes in regulations, industry standards, and best practices. We will also monitor developments around the world to ensure compliance with evolving requirements. Feedback from stakeholders will be incorporated to enhance the effectiveness of our policy.

For further information or questions regarding this policy, please contact us at <https://www.kyocera-avx.com/compliance-information/> or through your sales contact.

## VI. RECORDS

The documents generated regarding this policy are maintained by Global Materials and Supply Chain group.