



---

# Policy for Responsible Sourcing of Minerals

# Foxway Policy for Responsible Sourcing of Minerals

Foxway purchases electronic devices from leading brands in the electronics industry, often through distributors. This means that we neither manufacture nor contract the manufacturing of the hardware we sell to our customers. Nevertheless, we recognize the importance of responsible mineral sourcing in our industry, and are aware of the risks for human rights violations, conflict and environmental degradation resulting from the extraction of and trade with minerals, such as, but not limited to, tin, tantalum, tungsten, and gold.

This policy outlines our commitments towards mitigating the risks associated with sourcing of minerals, including in Conflict-Affected and High-Risk Areas,

This Policy applies to all employees of Foxway Group including all its subsidiaries and its affiliates (in the following "Foxway").

This policy should be read together with Foxway other policies.

## 1. Principles

### 1.1

Foxway will refrain from any action which contributes to the financing of conflict, and commits to comply with relevant United Nations sanctions, resolutions, or, where applicable, domestic laws implementing such resolutions. 1.2 Foxway will neither tolerate nor profit from, contribute to, assist with or facilitate the commission by any party of:

### 1.3

Foxway will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals.

### 1.4

When Foxway identifies a reasonable risk that a supplier is sourcing from, or is linked to, a party committing serious abuses as set forth above, we will suspend or discontinue our relation with such supplier.

### 1.5

Foxway demands that our Suppliers work proactively to ensure that minerals (such as, but not limited to, tungsten, tantalum, tin, and gold) in their products and supply chain are responsibly sourced, and communicates those requirements through our Supplier & Partner Code of Conduct incorporated in contracts and agreements with Suppliers.

### 1.6

Foxway will implement and maintain a thorough due diligence process for original equipment manufacturers and monitor their commitment to and compliance with RBA/RMI standards on a yearly basis.

## 2. Implementation and monitoring

### 2.1

The General Counsel is responsible for overseeing the implementation of this policy.

### 2.2

Regular audits and assessments will be conducted to monitor compliance with this policy and identify areas for improvement.

### 2.3

This policy will be revised at least once a year or when the need arises, to assure compliance with external and internal guidelines.

### 3. Document information

<b>Version</b>	3.0
<b>Document owner</b>	Sonia Braska
<b>Approved by</b>	Oskar Arndt, General Counsel
<b>Approval date</b>	18-02-2026

#### 3.1 Version history:

<b>Version</b>	<b>Document owner</b>	<b>Approved by</b>	<b>Approval date</b>
1.0	Sonia Braska	Kent H.Jeppesen, President C&E	20-10-2023
1.5	Sonia Braska	Stefan Nilsson, Chief Sustainability Officer	08-04-2024
2.0	Sonia Braska	Oskar Arndt, General Counsel	04-11-2024

