



EcoPro Group Responsible Minerals Policy

EcoPro Group and its affiliates ('EcoPro') are dedicated to the ethical and responsible sourcing of raw materials. We aim to minimize potential environmental and social impacts within our supply chain. To achieve this, we adhere to the principles outlined in the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for responsible supply chains of minerals from conflict-affected (the 'OECD DDG'), as well as the standards set by the Responsible Minerals Initiative (RMI). Additionally, we are committed to responsible sourcing practices by avoiding the risks identified in Annex X of the European Union (EU) Regulation Concerning Batteries and Waste Batteries 2023/1542 (the 'EU Battery Regulation').

Applicable Minerals

- Conflict minerals such as 3TG (Tin, Tantalum, Tungsten, Gold) originated from the Democratic Republic of the Congo (DRC) and its nine adjoining countries, which contribute to the ongoing conflict.
- Minerals used in battery Raw materials such as Cobalt, Lithium, Nickel, Manganese, Graphite, Aluminium.

OECD DDG Annex II Risks and Examples

OECD DDG Annex II Risks	Examples
Serious abuses associated with the extraction, transport, or trade of minerals	Torture, cruel, inhumane, and degrading treatment
	Forced or compulsory labour
	Child labour
	Sexual violence
	War crimes, violations of international humanitarian law, crimes against humanity, or genocide



Direct or indirect support to non-state armed groups	Illegal control of mine sites or transportation routes, illegal extortion of money along access routes and to intermediaries
Public or private security forces	
Bribery and fraudulent misrepresentation of the origin of minerals	Solicitation of bribes to conceal or disguise material origin, misrepresentation, taxes, fees, and royalties
Money laundering	-
Payment of taxes, fees, and royalties to governments	Non-payment of taxes, fees and royalties to governments

EU Battery Regulation Annex X Risks

Risk Categories	Details
Environment, climate and human health, considering direct, induced, indirect and cumulative effects	Air, including air pollution such as greenhouse gas emissions
	Water, including seabed and marine environment, and including water pollution, water use, water quantities (flooding or droughts) and access to water
	Soil, including soil pollution, soil erosion, land use and land degradation
	Biodiversity, including damage to habitats, wildlife, flora and ecosystems, including ecosystem services
	Hazardous substances
	Noise and vibration
	Plant safety
	Energy use
	Waste and residues
Human rights, labour rights and industrial relations	Occupational health and safety
	Child labour
	Forced labour
	Discrimination
	Trade union freedoms



Community life, including that of indigenous peoples	-
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EcoPro Commitment

- Aim to establish long-term relationships with our immediate suppliers.
- Strive to improve immediate suppliers' capacity and performance to ensure responsible sourcing practices.
- Participate in due diligence audit programs conducted by third-party organizations such as RMI to identify opportunities for continuous improvement in our responsible sourcing due diligence management system.
- Commit to transparency in the implementation of this policy by making available reports on our progress to relevant stakeholders and the public.
- This policy will be subject to regular review and potential revision in accordance with evolving international standards, regulations, and frameworks to ensure ongoing relevance and compliance.

EcoPro Requirements and Actions for Suppliers

- Due Diligence: Conduct thorough supply chain due diligence to identify and mitigate risks associated with the sourcing of raw materials. This includes:
 - Collect mineral origin information.
 - Verify supplier and sub-supply chain information.
- Risk Assessment: Assess the risks associated with sourcing raw materials, including those outlined in OECD DDG and EU Battery Regulation.
- Ensure Transparency: Provide the necessary information to ensure the origin and responsible sourcing of raw materials to maintain a transparent and traceable supply chain.
- Drive Engagement: Communicate our policy to suppliers and sub-suppliers to ensure compliance with responsible supply chain policies.



- Third-Party Due Diligence: Encourage suppliers and sub-suppliers to undergo due diligence from third-party due diligence programs such as IRMA and RMI to ensure responsible sourcing.
- Risk Mitigation Measures: Develop mitigation plans and take corrective actions when non-compliance with this policy is identified.
- Must comply with all requirements of this policy and applicable laws and regulations.
- Failure to comply may result in transactions being placed on hold or we reserve the right to search for alternative suppliers.

Grievance Mechanism

Grievances regarding our supply chain policy or due diligence system can be submitted via email to (ecohong23@ecopro.co.kr), or through the Cyber Whistleblower under the Ethical Management page on the EcoPro Group website.



■ Revision History

Rev. No.	Date	Revisions
0	2023.01.03	Policy Enacted [ECO24.005-T01]
1	2024.11.12	The EU Battery Regulation and EcoPro commitments have been added, and the requirements and actions have been revised

■ Related Standards