



## OCTAVE CONFLICT MINERALS POLICY

### 1 INTRODUCTION

Octave has a responsibility to uphold the highest standards of ethics and compliance in all business activities and regions in which it operates. Octave is committed to sourcing responsibly and respecting human rights in its own operations and supply chain, extending beyond legal compliance. The [Octave Code of Business Conduct and Ethics](#) (“**Code**”) and [Octave Supplier Code of Conduct](#) (“**Supplier Code**”), which apply to all Octave employees, guides interactions with customers and suppliers and promotes these commitments.

This Octave Conflict of Minerals Policy (“Policy”) applies to all directors, officers, employees and third parties acting on Octave’s behalf (“Personnel”). For the purposes of this Policy, “Octave” means Octave Intelligence plc, its subsidiaries, and joint ventures over which Octave exercises management control.

The term Conflict Mineral means columbite-tantalite (coltan, tantalum), cassiterite (tin), gold, wolframite (tungsten) or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in Democratic Republic of Congo or any of its adjoining country, as defined by the [Dodd-Frank Wall Street Reform and Consumer Protection Act](#).

While Octave does not mine, trade or source minerals directly, it may be indirectly exposed via its supply chain. Thus, identifying the use of Conflict Minerals with its suppliers is part of Octave’s commitment to responsible sourcing. Octave takes reasonable efforts to avoid use in its products of raw materials that directly or indirectly finance armed groups who violate human rights. Octave works together with its suppliers to manage raw materials and to increase transparency by investigating and determining the source of ‘Conflict Minerals’ in the supply chain as an important first step towards making any improvements.

Octave, to best of its knowledge, represents and certifies that it does not receive any materials or products containing cassiterite (tin), coltan (tantalum), wolframite (tungsten) or gold (known as “3TG minerals”) sourced from the Democratic Republic of Congo or any of its adjoining countries.

In case of any breach of this Policy, Octave will engage with the breaching party and take appropriate corrective action. Significant or recurring breaches, without corrective actions and remedy, or lack of cooperation, could result in termination of employment or Octave’s reduction or termination of business with the breaching party.

### 2 OCTAVE IS COMMITTED TO

- Continuously identifying which Octave products that may be exposed to Conflict Minerals.
- Continuously identifying suppliers that provide components and products likely to contain Conflict Minerals, and require them to, on an annual basis, complete a Conflict Minerals Report to conclude traceability of the Conflict Mineral.
- Regularly perform due diligence risk assessments on both new and existing suppliers to identify and evaluate risks associated with conflict minerals and develop and implement action plans to mitigate these risks.
- Deploying its best efforts around responsible business and due diligence measures to its suppliers where appropriate, which includes guidance on responsible sourcing of minerals.
- Ensuring that all suppliers adhere to the Octave Supplier Code, taking reasonable efforts to avoid use in its products of raw materials that directly or indirectly finance armed groups who violate human rights.

Ensuring that all suppliers undertake due diligence measures within their supply chain and that they document the source of origin of the minerals contained in the products provided to Octave and respond to Octave inquiries regarding the existence of Conflict Minerals in supplier products.

### 3 OCTAVE’S ACTIONS ARE

- Developing and implementing a Sustainability Programme within Octave.
- Developing and implementing a strong supplier qualification process which includes the monitoring of Conflict Minerals in its supply chain.
- Encouraging its suppliers to use the [OECD Due Diligence Guidance](#) in order for them to determine the source and chain of custody of the Conflict Minerals in the assemblies, parts or components supplied to a Octave entity.
- Expecting its suppliers to respond to Octave inquiries regarding the existence of Conflict Minerals in its products.
- Training its suppliers on Octave standards in relation to sustainability including Conflicts Minerals.

### 4 RAISING CONCERNS

Personnel are expected to promptly report any actual or suspected violations of this Policy or applicable laws. Reports may be made through Octave’s established reporting channels. Information on available reporting channels, confidentiality protections, and non-retaliation safeguards is available on Octave’s [website](#).

Reports are reviewed and investigated in accordance with the Octave’s Speak Up Policy and related procedures.