

Atea ASA

# Responsible Minerals Policy

As the leading provider of IT infrastructure and related services to organizations within the Nordic and Baltic regions, Atea purchases hardware 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 this policy outlines our approach towards it.

Minerals, such as tin, tungsten, tantalum, and gold (collectively referred to as 3TGs) along with cobalt, are sometimes extracted in regions where armed conflicts, and related human rights violations, take place. A well-known example of this is the Democratic Republic of Congo (DRC) and its neighboring countries. Currently, it is neither realistic nor effective to demand embargoes on minerals from certain areas as this could result in profound consequences for local communities. Instead, we support an approach built on robust due diligence that aims to advance responsible mining and trading activities in those areas, ensuring that these activities do not directly or indirectly finance any armed conflicts.

## Scope

The Atea Responsible Minerals Policy is binding across all Atea entities, requiring every Atea employee to adhere to the Group's standards in all business operations and decisions. It encompasses all members of the Atea Group and outlines our expectations towards suppliers of hardware products, including laptops, screens, mobile phones, peripherals, and other electronic devices sold by Atea. This policy should be considered in conjunction with other Atea policies.

## Our Commitment and Expectations on Suppliers

Our dedication to conducting due diligence in our value chain is a core aspect of our sustainability efforts. The framework for our systematic work is Atea's Supplier Code of Conduct, which incorporates the Responsible Business Alliance (RBA) Code of Conduct. Atea has identified our suppliers, the leading IT brands, as the key pinch point in our supply chain where we direct our due diligence efforts regarding responsible sourcing of minerals. Suppliers are informed of these expectations via our partner portal, Atea's external website as well as through partner dialogues.

Beyond compliance with relevant legal obligations related to minerals sourcing, Atea expects suppliers to:

- Work towards conflict-free sourcing of minerals.
- Conduct due diligence for relevant minerals that might be associated with conflict or high-risk areas to avoid contributing to conflict and human rights abuses in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and extend these expectations to their own suppliers.
- Suppliers shall establish and maintain a strong management system for responsible sourcing of minerals, including a publicly available policy on responsible mineral sourcing.
- Suppliers shall understand their minerals supply chain, including the intermediaries involved. This includes knowledge of the minerals' country of origin.
- Suppliers shall identify and assess risks associated with mineral sourcing, especially in conflict-affected and high-risk areas.
- Suppliers shall implement a strategy to respond to identified risk and monitor their performance of risk mitigation efforts.
- Suppliers shall identify smelters or refiners involved in processing minerals. Suppliers should also verify whether smelters or refiners have undergone independent audits which show compliance with international standards.
- Suppliers are expected to make their due diligence processes and findings accessible to the public on an annual basis.

Atea requests that prioritized partners provide us with information on their responsible sourcing processes and due diligence results on an annual basis, as well as other relevant information related to their mineral sourcing activities.

## Collaboration and Continuous Improvement

Our commitment extends beyond compliance to actively promoting positive change in responsible minerals sourcing. As a member of Responsible Business Alliance (RBA) and its adjacent Responsible Minerals Initiative (RMI), we actively participate in industry and stakeholder discussions on responsible sourcing of minerals, keeping ourselves updated on current issues within this theme.

Moreover, Atea promotes circularity through our Sustainable Life Cycle Management services and our 100% Club network to reduce our value chain's dependency on virgin materials as well as encourages extended lifespan for the IT products we deliver to customers in our dialogue. Furthermore, we engage Nordic IT buyers to promote sustainable IT through their procurement and consumption choices in our initiative Atea Sustainability Focus (ASF).

## Contact

You can read more about Atea's sustainability work on [our ESG website](#). For more information about the RMI, see [the RMI website](#).

We acknowledge that there are many knowledgeable organizations that can assist us in understanding the risks and dynamics of our value chain. If you would like to share information with us or request further details, please contact us at [responsiblesourcing@atea.se](mailto:responsiblesourcing@atea.se). The information provided will be treated as confidential.

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More information available at  
<https://www.atea.com/esg-overview>

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