

RESPONSIBLE MINERALS POLICY

As a global provider of technology services, products and solutions, Venture is committed to responsible sourcing of minerals. Venture is fully supportive of global efforts to ensure responsible manufacturing processes with transparent sourcing such as section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("**Dodd-Frank Act**") and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("**OECD DDG**").

The Responsible Business Alliance (RBA) and the Global e-Sustainability Initiative (GeSI) have requested that companies undertake reasonable due diligence with their supply chain, to assure that specified metals are not being sourced from mines in the Conflict Regions, which are controlled by non-government military groups, or unlawful military factions, or involving issues highlighted in Annex II of the OECD DDG, such as armed groups, serious abuses, security forces, bribery, money laundering etc.

Venture supports the actions of the RBA and GeSI and its Responsible Minerals Policy is modelled on RBA standards on responsible minerals. We engage with our supply chain partners to ensure compliance with RBA standards on responsible minerals and Annex II of the OECD DDG. All suppliers are required to adopt a policy assuring that tantalum, tin, tungsten and gold used in the products that they manufacture are conflict-free. All suppliers are required to establish their own due diligence frameworks to ensure compliance with responsible sourcing of materials from Conflict-Affected and High-Risk Areas (as defined in the OECD DDG). Suppliers have to cross-check against the list of known smelters and the Conflict Free Smelter list (relating to 3TG), published by the RBA. (*http://www.responsiblemineralsinitiative.org/smelters-refiners-lists/smelter-reference-lists-export/*).

Although cobalt is not a "conflict mineral" as defined under section 1502 of the Dodd-Frank Act, Venture is committed to taking steps to broaden its responsible mineral management system to include cobalt. We commit to further engagement with suppliers who provide materials containing cobalt on their cobalt due diligence processes and are working with them to improve capabilities or facilitate alternative sourcing, as appropriate.

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25 October 2021