

Start Plast Kft. is committed to ethical business practices and responsible mineral sourcing. We support global efforts to prevent the financing of armed conflict and human rights abuses.

01 | PURPOSE



This Policy establishes the principles and requirements for the responsible sourcing of minerals throughout our supply chain and demonstrates our commitment to preventing the direct or indirect financing of armed groups through the trade of conflict minerals.

02 | SCOPE



This Policy applies to:

- all Start Plast employees;
- the Purchasing, Quality, Logistics and Supplier Management functions;
- all suppliers and sub-suppliers;
- all raw materials, components and products supplied to Start Plast.

03 | APPLICABLE REQUIREMENTS



Start Plast conducts its business in accordance with:

- Regulation (EU) 2017/821;
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- Responsible Minerals Initiative (RMI);
- Responsible Minerals Assurance Process (RMAP);
- Customer-specific requirements, including Samsung Electronics Responsible Minerals Requirements.

04 | OUR COMMITMENT



Start Plast is committed to:

- sourcing minerals responsibly and ethically;
- promoting transparency throughout the supply chain;
- preventing the direct or indirect financing of armed groups;
- encouraging sourcing from RMAP-conformant smelters and refiners whenever possible;
- maintaining complete traceability of supplier declarations;
- complying with all applicable legal and customer requirements.

05 | SUPPLIER REQUIREMENTS



Start Plast requires its suppliers to:

- submit the latest version of the Conflict Minerals Reporting Template (CMRT);
- communicate these requirements throughout their own supply chains;
- exercise due diligence in accordance with the OECD Guidance;
- source 3TG minerals, whenever possible, from RMAP-conformant smelters and refiners;
- promptly notify Start Plast of any significant changes affecting their CMRT declarations;
- cooperate fully during customer or supplier audits.

06 | DUE DILIGENCE PROCESS



- Supplier Qualification



- CMRT Collection and Verification



- Review of Supplier Declarations



- Smelter and Refiner Verification



- Supply Chain Risk Assessment



- Implementation of Corrective Actions



- Annual Management Review

07 | CORRECTIVE ACTIONS



Where non-conformities or supply chain risks are identified, Start Plast may require suppliers to:

- develop and implement a Corrective Action Plan (CAP);
- provide additional supporting documentation;
- undergo follow-up or on-site audits;
- transition to RMAP-conformant smelters and refiners;
- take timely actions to eliminate identified risks.



Failure to address significant non-conformities may affect the supplier's approval status or business relationship with Start Plast.

08 | RESPONSIBILITIES

FUNCTION		RESPONSIBILITY
	Top Management	Approve and oversee the Policy
	Purchasing	Supplier communication and engagement
	Quality	CMRT review and compliance verification
	Supplier Management	Supplier performance monitoring
	Suppliers	Compliance with this Policy

09 | REPORTING



Start Plast shall:

- maintain accurate records related to Conflict Minerals due diligence;
- provide information upon customer request;
- retain documentation for audit purposes;
- regularly review and improve its responsible sourcing program.

10 | CONTINUAL IMPROVEMENT



Start Plast is committed to continually improving its responsible minerals sourcing program through:

- regular supplier performance evaluations;
- monitoring changes in applicable legislation;
- implementation of updated customer requirements;
- adoption of Responsible Minerals Initiative (RMI) best practices;
- internal audits and management reviews.

This Policy shall be reviewed at least annually, or whenever significant regulatory or customer requirements change.