

## IBM Corporation - Responsible Minerals Policy (updated May 2024)

IBM's Responsible Minerals policy addresses the parameters defined in the US Dodd-Frank Financial Reform Act of 2010 (section 1502).

IBM's Responsible Minerals policy is anchored in the Organisation for Economic Co-Operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).

Additionally, the IBM policy is conformant with the Responsible Business Alliance (RBA) Code of Conduct, section D7, Responsible Sourcing of Minerals.

- IBM requires its suppliers to support our objective of a minerals supply chain that does not support armed groups in the Democratic Republic of the Congo, and adjoining countries, nor from similar groups in other CAHRAs.
- Suppliers are to ensure minerals used in IBM's supply chain are sourced from conformant or active smelters or refiners that have been assessed by one of the accredited schemes: LBMA, RJC, RMAP, or TI-CMC; or are 100 percent recycled processors.
- IBM's Responsible Minerals Policy is applicable to the following minerals (from a reporting perspective): tantalum, tin, tungsten, and gold (collectively referred to as 3TG), cobalt, and mica.
- IBM participates in industry groups such as the Responsible Minerals Initiative (RMI), Responsible Business Alliance (RBA), and metals organizations. We encourage our suppliers to join these organizations to increase the effectiveness of this policy and its objectives.