



# RESPONSIBLE LOBBYING POLICY

At Device Europe, we conduct our business with transparency, integrity, and a deep sense of responsibility toward all stakeholders. The way we make decisions, interact with our partners, and engage with our external environment is guided by our core values and by the principles reflected in our mission, vision, and the policies contained in this Handbook. These include our Code of Ethics, Anti-Corruption Policy, Human Rights Policy, Sustainability commitments, and the governance obligations embedded in our Articles of Association.

Although Device Europe does not currently engage in any form of lobbying, we believe it is important to formally define the standards that would govern any such activity in the future. This ensures that any interaction with public institutions, regulatory bodies, or policymaking processes is conducted in a responsible, ethical, and socially beneficial manner, fully aligned with our commitment to generating positive environmental and social impact.

## Our Approach

Any future lobbying activity undertaken by Device Europe would be guided by the same purpose that drives our daily operations: contributing to long-term positive outcomes for society and the environment. We will not participate in advocacy that conflicts with our values, with principles of sustainability, or with the rights and dignity of individuals.

Our positions on public matters are always grounded in reliable and evidence-based information. When forming views on regulation or public policy, we rely on credible data, independent analyses, and scientific findings. We do not support positions based on misinformation, speculation, or short-term interests inconsistent with our corporate purpose.

## Collaboration with Industry Organizations

We participate in networks, associations, and industry groups whose goals align with responsible development of the ITAD sector. When engaging with such organizations, we expect alignment with our ethical principles and our commitment to responsible impact. Should an intermediary organization adopt a policy stance that contradicts our values or this Policy, Device Europe will clearly communicate its own position, work constructively to encourage positive change, and - if necessary - end its cooperation.

We ensure that any action taken on our behalf by an intermediary is consistent with the standards outlined in this Policy and with our broader ESG and ethical framework.

## Transparency, Integrity, and Political Neutrality

Device Europe does not make financial or in-kind contributions to political parties, electoral candidates, or political committees. We do not attempt to influence decision-making processes through improper or opaque means, nor do we engage in activities that could reasonably be perceived as undue influence.

All contact with public officials is conducted transparently, in good faith, and in accordance with applicable laws, including our Anti-Corruption Policy. We maintain full documentation of such interactions and uphold the principles of honesty, fairness, and impartiality.

## Governance and Oversight

The Management Board oversees the implementation and observance of this Policy, ensuring that any current or future advocacy remains consistent with our purpose, values, and legal obligations. Any employee or representative acting on behalf of Device Europe in matters relating to regulation or public policy must inform the Management Board and obtain explicit approval before engaging in such activity.

This Policy forms an integral part of our governance model and is closely linked with our integrated management system, including ISO 9001, ISO 14001, ISO 45001, ISO/IEC 27001, and the R2v3 Standard. Risks related to external engagement are monitored and reviewed as part of our ongoing risk-management processes.

## Raising Concerns

We provide accessible and confidential channels for reporting concerns related to business conduct or potential violations of this Policy. Our whistleblowing and grievance mechanisms ensure that any individual - employee, supplier, partner, or other stakeholder - may raise concerns without fear of retaliation. Each case is treated seriously, reviewed impartially, and addressed in a timely and transparent manner.

## Review and Updating of the Policy

This Policy is reviewed regularly and approved by the Management Board. It is updated at least every two years or sooner if regulatory developments, business needs, or strategic considerations require adjustments.

Through this Policy, Device Europe reaffirms its commitment to ethical conduct, transparency, and responsible participation in public dialogue, ensuring that any advocacy we undertake contributes to positive societal and environmental outcomes.

