

RESPONSIBLE MINERALS POLICY (“RM Policy”)

(as adopted November 19, 2024)

I. Background/Introduction/Definitions

The United Nations Group of Experts on the Democratic Republic of the Congo (“DRC”) has found that the trade of columbite-tantalite (coltan/tantalum), cassiterite (tin), wolframite (tungsten), and gold, commonly called conflict minerals (“3TG” or “Conflict Minerals”), is helping, directly or indirectly, to finance armed groups in the DRC and Adjoining Countries (as defined herein), where extreme levels of violence, including sexual and gender-based violence and other human rights violations, regularly occur. Adjoining Countries refers to countries that share an internationally recognized border with the DRC, which includes Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

In July 2010, the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) was signed into law. Section 1502 of the Dodd-Frank Act (“Section 1502”) requires public companies like Nextracker Inc. (“Nextracker”) to conduct supply chain due diligence regarding Conflict Minerals that are necessary to the functionality or production of a product manufactured or contracted for manufacture and that originate in the DRC or Adjoining Countries. As directed by Section 1502, in August 2012, the U.S. Securities and Exchange Commission (“SEC”) released final rules requiring all public companies to disclose and report annually to the SEC (refer to SEC Form SD) if the 3TG minerals used in their products originated from the DRC or Adjoining Countries.

In May 2017, the European Union (EU) issued the Regulation (EU) 2017/821, a.k.a., the Regulation on Responsible Sourcing of Minerals. The operational due diligence provisions of this regulation have been applicable to EU importers since January 1, 2021, and require EU importers, whose annual imports of the specified minerals exceed certain thresholds, to perform and report on their due diligence measures performed within their respective supply chains.

II. Purpose

Nextracker is committed to the responsible sourcing of minerals and complying with all applicable legislation regarding the use of conflict minerals mined from the DRC and Adjoining Countries. This RM Policy communicates Nextracker’s protocols, standards, and methods regarding Conflict Minerals in our supply chain, including our due diligence requirements and expectations for suppliers in our supply chain. Nextracker supports the purpose of the Responsible Minerals Initiative (“RMI”), and we make use of the tools and resources created by the RMI to support our Conflict Minerals due diligence program. More broadly, our mineral management due diligence extends to cobalt and other necessary minerals. We support responsible sourcing of Conflict Minerals from the DRC and Adjoining Countries in accordance with the OECD’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“CAHRAs”), and that includes acting accordingly after regularly considering the risks identified in Annex II of the OECD Guidance and other relevant conflict minerals regulation (e.g., the OECD Guidance’s model supply chain policy).

III. Scope

This RM Policy applies to all subsidiaries of Nextracker Inc. and its global supply chain.

IV. Policy Statement

Nextracker is committed to responsibly sourcing raw materials used in the components and products we sell to our customers. We follow the RMI standard and will collaborate with our customers, suppliers, and other stakeholders in furtherance of this objective. Our policies include the following:

- Nextracker will require declarations from Nextracker suppliers to ensure transparency in our supply chain. Nextracker suppliers are required to provide, on an annual basis or in a timely manner following any request, a complete, accurate, and current (i) RMI Conflict Minerals Reporting Template, (ii) an Extended Mineral Reporting Template (which is for cobalt and mica reporting), and (iii) other necessary information to demonstrate that such materials sourcing does not directly or indirectly finance or benefit armed groups in the DRC or an Adjoining Country.

- Nextracker expects suppliers to source from socially responsible suppliers and to conduct their own due diligence in furtherance of that goal. Nextracker sources from suppliers using sources from other regions but also from suppliers who have confirmed non-conflict sources, even if those sources do come from the DRC or Adjoining Countries.
- Nextracker expects-suppliers to: (i) work toward sourcing from facilities (a.k.a., smelters or refiners) that: (a) are RMAP-conformant or RMAP-validated; (b) comply with RMI standards and which are considered “RMI-eligible;” or (c) conform to an RMAP-equivalent assurance process (i.e., LBMA or RJC); and (ii) provide annual updates regarding their progress toward this goal.
- Suppliers are expected to: (i) have policies and procedures to ensure that products and parts supplied to Nextracker are sourced per this RM Policy; and (ii) provide those policies and procedures to Nextracker upon request.
- Suppliers are expected to document and provide to Nextracker all necessary due diligence information to confirm that all 3TG supplied to Nextracker complies with this RM Policy and that various minerals (i.e., other than 3TG) identified as a source of concern by the RMI have been responsibly sourced. Nextracker expects suppliers to pass this requirement on to their respective supply chains.
- Compliance with these requirements will be taken into consideration when selecting and retaining suppliers. If a supplier does not meet our expectations regarding responsible sourcing, we will work with the supplier, including by leveraging industry-wide programs as appropriate, to build its capacity for responsible sourcing if appropriate.
- Nextracker proactively verifies and assesses risk factors within its supply chain and develops and implements improvement plans to mitigate identified risks, pursuant to OECD Annex II, and provides reports of such when reasonably requested by Nextracker stakeholders.
 - Suppliers are required to promptly implement corrective actions once risks have been identified that merit correction or improvement.
 - After Nextracker performs its due diligence, Nextracker will generate NXT CMR and EMR reports that indicate facilities’ sourcing entities and provide to customers or other stakeholders when applicable and reasonably requested.
- Nextracker will continue to monitor global developments and the emergence of additional requirements and standards related to the sourcing of minerals or other materials from the DRC and Adjoining Countries or other regions to continually improve our RM Policy.
- Employees whose responsibilities relate to the sourcing of parts, components, and materials are expected to support Nextracker’s compliance with these requirements, associated legislation, and corresponding regulations.

V. Contact Information and Questions

For assistance with any questions or concerns regarding this RM Policy, please contact esg@nextracker.com.