

RAPID MICRO BIOSYSTEMS, INC.
RESPONSIBLE MINERALS POLICY

(As of May 29, 2024)

I. INTRODUCTION

a. Purpose

This Policy has been adopted by Rapid Micro Biosystems, Inc. (the “Company”) and is designed to guide the Company’s development and maintenance of a responsible supply chain with regards to the sourcing of minerals with an initial focus on columbite-tantalite (“coltan”), cassiterite, wolframite and/or gold or their derivatives, which are limited to tantalum, tin, and tungsten (referred to as “3TG”). This Policy is applicable to all Rapid Micro Biosystems lines of business and global operations.

b. Motivation

The Company recognizes the risks associated with sourcing minerals from conflict-affected and high-risk areas, where some mining operations may directly or indirectly fund non-state armed groups, engage in money laundering, and/or tolerate or profit from human rights abuses (“Identified Risks”).

This Policy is guided by the risk identification and mitigation approaches and recommendations provided by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”) and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

II. DECLARATION

a. Objectives

While the Company does not directly source any minerals from conflict-affected and high-risk areas identified by the OECD Guidance, minerals may exist in products, materials, and components that the Company sources from its suppliers.

The Company has the following objectives in relation to its supply chain:

1. Maintaining a responsible supply chain and undertaking reasonable due diligence within the Company’s supply chain to prevent financing conflict, enabling human rights abuses, and contributing to humanitarian crises;

2. Complying with all relevant regulations governing the sourcing of minerals; and
3. Working with suppliers to undertake reasonable due diligence within their supply chain, to ensure the responsible sourcing of 3TG minerals that are utilized in components and materials of the Company's products.

This Policy aligns with the Company's mission to provide mission-critical automation solutions to facilitate the efficient manufacturing and fast, safe release of healthcare products such as biologics and cell and gene therapies, vaccines, and sterile injectables.

a. Responsible Supply Chain

The Company expects the following of its suppliers:

1. To undertake reasonable due diligence within their supply chain to determine the source and chain of custody of their 3TG, including developing policies and systems to avoid the use of 3TG that are associated with Identified Risks;
2. To respond to information requests regarding the uses and sources of minerals in their products, including information about minerals that are recycled or scrapped;
3. To assist in compliance with any rules and regulations relating to minerals and to provide certain related representations, declarations or certifications if requested to do so; and
4. To hold all of their own suppliers to these same requirements.

The Company intends to work with its suppliers to establish 3TG traceability and communicate expectations for its suppliers under this Policy. The Company intends to evaluate its relationships with its suppliers on an ongoing basis with a view towards meeting the goals and principles underlying this Policy.