

Conflict Minerals Policy

The Nayax Group (**'the company'** or '**Nayax**') is a global commerce enablement, payments, and loyalty platform. As part of our mission to improve customers' revenue potential and operational efficiency, we are committed to ethical business practices and social responsibility. This includes addressing the issue of conflict minerals in our supply chain by verifying that our supply chain remains free from conflict minerals that directly or indirectly finance or benefit armed groups in conflict-affected regions.

Nayax is committed to the responsible and transparent sourcing of conflict minerals and considers mining activities that potentially fund armed conflict or human rights violations as unacceptable.

On August 22, 2012, the U.S. Securities and Exchange Commission (**'SEC'**) approved the final rule of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, known as the Conflict Minerals Rule. The aim of this rule is to prevent violence and human rights violations in the Democratic Republic of Congo (**'DRC'**) and neighboring countries (collectively referred to as the **'Covered Countries'**) by cutting off a major source of funding for armed groups responsible for these abuses.

The law requires companies that file certain SEC reports to identify the products containing conflict minerals which are necessary to the functionality or production of the product manufactured or contracted to be manufactured, and to provide annual disclosures about the use of specified conflict minerals (tantalum, tin, tungsten, and gold, or **'3TG,'** and their derivatives) that emanate from the Covered Countries.

This process applies to all products manufactured by or for the company, as well as to all suppliers and subcontractors involved in the extended supply chain.

The purpose of this Conflict Minerals Policy is to outline Nayax's commitment to sourcing materials responsibly and to ensure that its products do not knowingly contain conflict minerals that directly or indirectly finance or benefit armed groups in conflict-affected regions.

This policy applies to all Nayax employees, suppliers, and business partners involved in the sourcing, manufacturing, and distribution of products that may contain conflict minerals.

Nayax conducts due diligence on the source and chain of custody of conflict minerals in our extended supply chain, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the ‘**OECD Guidance**’)¹.

Under this policy, Nayax refrains from knowingly purchasing any products, components or materials that contain conflict minerals which have not been certified as DRC Conflict-Free (as defined by the Conflict Minerals Rule). Nayax does not purchase 3TG or its derivatives directly from smelters or mines. Nayax works with its suppliers to ensure awareness and compliance with the terms of this policy.

Nayax expects its suppliers to:

- Conduct responsible conflict mineral sourcing within their own supply chains through due diligence practices that conform to the OECD Guidance
- Implement and enforce policies to ensure to Nayax that conflict minerals are sourced responsibly.
- Provide Nayax with accurate and timely information regarding the origin of conflict minerals used in their products, using the Responsible Minerals Initiative (‘**RMI**’) Conflict Minerals Reporting Template (‘**CMRT**’), in its most up-to-date version, and cooperate with Nayax’s due diligence efforts, including providing necessary documentation and participating in audits as required.

Nayax is committed to a thorough due diligence process to ensure the implementation of this policy. This involves establishing a robust management system to support the policy's implementation, which includes assigning responsibility to relevant personnel at the company. Nayax identifies and assesses risks in its supply chain related to conflict minerals, and is implementing a strategy to respond to the identified risks. This strategy includes engaging with suppliers annually to mitigate risks. Additionally, the company will report annually on its conflict minerals due diligence efforts and make this information publicly available, as part of its required annual reporting with the SEC through Form SD.

¹ https://www.oecd.org/en/publications/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_g1g65996.html

Nayax is committed to continuous improvement in its conflict minerals program. Nayax regularly reviews and updates its policies and procedures to ensure they remain effective and aligned with industry best practices and regulatory requirements.

Nayax is dedicated to promoting ethical business practices and social responsibility throughout its supply chain. By adhering to this Conflict Minerals Policy, Nayax aims to contribute to the global effort to eliminate the use of conflict minerals that finance armed conflict and human rights abuses.

To report concerns about conflict minerals in Nayax's supply chain or submit a grievance, please contact conflictminerals@nayax.com. Nayax ensures all reports are promptly investigated and addressed, maintaining transparency and accountability in enforcing its Conflict Minerals Policy.