	Document Title:	Document Number:	CCE_HR_011
	Conflict Minerals Policy	Process Owner:	Human Resources Manager
		Revision Number:	001
		Revision Date:	1/20/2024

Conflict Minerals Policy

Purpose

Markdom is committed to legal compliance, ethical conduct, human rights, anti-corruption and environmental protection, which extend to our expectations of our partners, subcontractors and suppliers. As a responsible company, Markdom supports the goal of the Dodd-Frank Act of preventing armed groups in the Democratic Republic of the Congo and adjoining countries from benefitting from the sourcing of Conflict Minerals from that region.

This Policy on Conflict Minerals clarifies the illegal trade of natural resources, particularly certain minerals, known as Conflict Minerals.

Scope

We recognize the need to end the illegal extraction and trade of natural resources, and the associated human rights violations, conflict and environmental degradation, which results from this trade. These issues are in a critical state in the region of the Democratic Republic of Congo (DRC) as a result of certain unlawful practices in the extraction and trade of ores of tantalum, tin, tungsten and gold, which flow to world markets (including the automotive industry) through the DRC region. We are taking action to increase transparency, ensure responsible procurement, and drive positive change in this area.


Responsibilities

We prohibit human rights abuses associated with the extraction, transport or trade of minerals. We also prohibit any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain.

Similarly, we do not tolerate corruption, money-laundering and bribery. We require the parties in our supply chain to agree to follow the same principles and are working with our supply chain to improve the traceability of minerals and ensure responsible sourcing.

Suppliers who manufacture components, parts, or products containing tin, tantalum, tungsten, and/or gold must commit to only sourcing those materials from environmentally and socially responsible sources.

In order to comply with the rules and regulations promulgated by the U.S. Securities and Exchange Commission (“SEC”) under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer

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Protection Act, we will review our sourcing supply chain to identify any minerals that may qualify as “conflict minerals” under the SEC rules. Information will be requested from suppliers as appropriate.

Expectations


Markdom has the following expectations of its suppliers of components for products that we manufacture or for products that we contract with them to manufacture:

- We expect our suppliers to promptly, completely and accurately respond to our informational requests with respect to the production of such products, including by completing and delivering the Conflict-Free Sourcing Initiative Conflict Minerals Reporting Template or similar survey (the “Survey”) when asked to do so.
- We expect our suppliers to implement policies and management systems to support compliance with these expectations and require their upstream suppliers to adopt similar policies and systems.
- We expect our suppliers to cooperate in the event we determine that any further inquiry or due diligence is required or advisable with respect to the supply of 3TG in any such products.

We have incorporated the principles of this policy into the requirements of our contractually binding Supplier Manual and we work with our suppliers to increase transparency in the supply chain. Markdom supports industry initiatives, such as the Conflict Free Smelter Program (CFS), to validate that the metals used in our products are not contributing to conflict and come from sustainable sources. Once validated smelter lists are available, suppliers will be requested to procure materials only through validated smelters.

If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe, or we may terminate our business relationship with such supplier.

We maintain a database of material composition information for all our products which allows us to identify suppliers that use tin, tantalum, tungsten and/or gold in their products. Material composition data along with information gathered from suppliers, industry initiatives (e.g. Conflict Free Smelter program), and other available sources are used to assess risks of non-compliance to this policy.

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Policy Review

This Policy will be reviewed annually or more frequently if necessary. Updates or changes to the Policy will be communicated to all parties involved to ensure continued adherence.