

This template is provided to assist you in fulfilling your responsibilities to establish a Conflict-Free Policy. Nothing in this template creates any new requirements. Furthermore, following this template does not guarantee compliance with any applicable legal requirements or provide a safe harbor from regulatory responsibility.

### **Conflict Free Policy**

At “Company”, we are committed to ethical sourcing practices and maintaining integrity throughout our supply chain. As such we adhere to the following principles:

“Company” will not tolerate any form of direct or indirect support to nonstate arm groups. Supplier must ensure that all minerals supplied to “Company” do not directly indirectly contribute to conflict. It is a responsibility as our suppliers to conduct due diligence and certified conflict free status of the minerals, they provide.

### **Transparency and Accountability.**

We encourage transparency and accountability throughout our supply chain. Suppliers are expected to provide documentation and evidence of the origin of and chain of custody of minerals, demonstrating compliance with our conflict free policy.

### **Continuous Monitoring and Improvement**

“Company” is committed to continually monitoring improving our practices to ensure compliance with the policy. We will work collaboratively with our suppliers and stakeholders to identify and address any potential risks or issues related to conflict minerals.

### **Training and Awareness**

We will provide training and raise awareness among our employees, suppliers and stakeholders about the importance of conflict-free sourcing and the requirements of this policy.

### **Non-Retaliation**

“Company” prohibits any form of retaliation against individuals or entities that report violations or concerns related to conflict minerals sourcing. We encourage open communications and cooperation to address any compliance issues promptly and effectively.

By adhering to this free policy “Company” reaffirms, its commitment to responsible practices.