

Conflict-Free Mineral Sourcing Policy & Statement



1. Purpose

Electroninks Incorporated is committed to responsible sourcing practices and to ensuring that materials used in our products are obtained in a manner that respects human rights, avoids contributing to conflict, and aligns with applicable laws and industry standards. This policy outlines our approach to sourcing tin, tantalum, tungsten, gold (“3TG” materials), and any other minerals identified as conflict-affected or high-risk.

2. Scope

This policy applies to all materials, components, and products procured by Electroninks Incorporated, and it extends to all suppliers, subcontractors, and other entities that provide goods or services incorporated into our products.

3. Definitions

The definition of “conflict minerals” refers to gold, as well as tin, tantalum, and tungsten, the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed, or sold. The U.S. Secretary of State may designate other minerals in the future if it determines that such minerals are financing conflict in the Covered Countries.

In addition to the Democratic Republic of the Congo (DRC), the “Covered Countries” are Angola, Burundi, Central African Republic, Congo Republic, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

4. Commitment to Responsible Mineral Sourcing

Electroninks Incorporated is committed to:

- Avoiding the use of minerals that finance, or benefit armed groups or contribute to human rights abuses.
- Supporting efforts to improve transparency and responsible mineral supply chains globally.
- Aligning with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

- Aligning with Section 1502 of the Dodd-Frank Act, which aims to prevent the use of minerals that directly finance, or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries (“conflict minerals”).
- Complying with all applicable regulations related to conflict minerals, including customer-specific and jurisdictional requirements.

5. Supplier Requirements

Electroninks Incorporated expects our suppliers to:

- Source 3TG and other high-risk minerals exclusively from smelters and refiners that are audited and validated by recognized industry programs, such as Responsible Minerals Assurance Process (RMAP).
- Implement their own due diligence measure consistent with OECD Guidance.
- Provide complete and accurate reporting when requested, including the most recent Conflict Minerals Reporting Template (CMRT) or equivalent documentation.
- Cooperate with Electroninks Incorporated in investigations, audits, or corrective actions related to mineral sourcing.

6. Due Diligence and Risk Management

To uphold this policy, Electroninks Incorporated will:

- Conduct reasonable, good-faith due diligence on the mineral supply chain of relevant suppliers.
- Assess suppliers for risks related to conflict minerals and escalate issues as appropriate.
- Work with suppliers to remediate identified risks or, if necessary, reassess business relationships where non-compliance persists.
- Maintain records of due diligence activities and produce disclosures as required by regulations or customer requests.

7. Continuous Improvement

Electroninks Incorporated supports continuous improvement in mineral supply chain transparency. We will regularly evaluate our practice, update this policy as needed, and promote responsible sourcing expectations throughout our supply base.

8. Reporting Concerns

Suspected violations of this policy can be reported confidentially to the Chemical Regulatory Specialist. All concerns will be reviewed and addressed appropriately.

9. Policy Approval and Oversight

This policy is approved by the Regulatory department and is to be reviewed on an annual basis as regulatory requirements evolve.

Approved by: Robert Gilhuly

Robert Gilhuly

Manager, Global Quality & Regulatory Compliance

Revised on: March 27, 2026