

Conflict Minerals Policy Statement (Updated 2026)

INTRODUCTION

The extraction and trade of certain minerals in the Democratic Republic of Congo (DRC) and adjoining countries—as well as other Conflict-Affected and High-Risk Areas (CAHRAs) worldwide—have been linked to human rights abuses and the funding of illegal armed groups.

In accordance with **Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act**, SEC regulations, and the **EU Conflict Minerals Regulation**, Milpower Source is committed to ensuring that its supply chain is transparent and ethical. This policy aligns with Milpower Source's mission of promoting human flourishing and maintaining the highest standards of business conduct and ethical principles.

DEFINITIONS

- **Conflict Minerals:** Defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives: **tantalum, tin, and tungsten (3TG)**. This definition includes any other minerals or derivatives subsequently designated by the U.S. Secretary of State or relevant international authorities as financing conflict.
- **DRC Adjoining Countries:** Countries bordering the DRC, including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.
- **CAHRAs (Conflict-Affected and High-Risk Areas):** Areas in a state of armed conflict, fragile post-conflict regions, or areas with weak/non-existent governance and systematic violations of international law.
- **DRC Conflict-Free:** Parts or components that do not contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.
- **Recycled/Scrap Sources:** Minerals obtained from reclaimed end-user or post-consumer products, or scrap processed metals created during manufacturing. These are considered "Conflict-Free" provided they meet the criteria for verified recycled content.

POLICY

Milpower Source is committed to conducting its global operations in full compliance with applicable laws regarding conflict minerals. To achieve this, Milpower Source will:

- **Supplier Engagement:** Inform all direct suppliers of this policy and require alignment with our Supplier Code of Conduct.
- **Chain of Custody:** Collaborate with suppliers to identify the chain of custody for 3TG minerals, targeting transparency down to the smelter or refiner (SOR) level.
- **Due Diligence:** Conduct reasonable due diligence in alignment with the **OECD Due Diligence Guidance** for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- **Sourcing Strategy:** Take proactive measures to source parts and components from suppliers validated as "Conflict-Free" by recognized third-party audit programs (e.g., the Responsible Minerals Assurance Process - RMAP).

- **Continuous Improvement:** Work with suppliers to improve their sourcing performance, aiming for a supply chain that is 100% validated as conflict-free.

SUPPLIER REQUIREMENTS

Suppliers to Milpower Source are expected to:

- Maintain compliance with SEC and international regulations related to conflict minerals and provide all necessary declarations (e.g., the Conflict Minerals Reporting Template - CMRT).
- Implement their own conflict mineral policies and management systems, cascading these requirements down to their sub-tier suppliers.
- Source only from smelters and refiners that have been validated as conflict-free by independent third-party audit bodies.
- Maintain all relevant "Chain of Custody" data for a minimum of **five (5) years** and provide such documentation to Milpower Source upon request.
- Ensure a response rate to Milpower Source's inquiries regarding mineral origins of at least **75%** (as an interim performance metric) while striving for total transparency.

COMPLIANCE & NON-COMPLIANCE

This policy applies to all Milpower Source global operations. Employees involved in procurement and supply chain management are required to adhere to these guidelines.

In cases of **Non-Compliance**, Milpower Source will work with the supplier to implement corrective actions. Milpower Source reserves the right to suspend or terminate relationships with suppliers who fail to comply with this policy or who fail to demonstrate a commitment to ethical sourcing.

REPORTING & CONTACT

- **Violations:** Potential violations should be reported to supervisors, unit management, or the **Center for Global Business Conduct**.
- **Inquiries:** General questions regarding this policy should be directed to the **Milpower Source Manager of Compliance in Supply Management**.

Critical and Battery Minerals:

Beyond 3TG, Milpower Source recognizes the importance of responsible sourcing for minerals essential to the energy transition, specifically **Cobalt** and **Lithium**. These minerals are subject to enhanced due diligence to address environmental risks, forced labor, and child labor in line with the **EU Battery Regulation (2023/1542)**.

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