

Conflict Minerals Policy

1. Purpose

This policy outlines the commitment of Komtek Forge, a precision forging manufacturer, to responsible sourcing of raw materials, specifically tin, tungsten, tantalum, and gold (3TG). These minerals are commonly referred to as "conflict minerals." Our goal is to ensure our supply chain does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries.

2. Scope

This policy applies to all suppliers, vendors, and subcontractors involved in the supply of raw materials, components, or finished goods to Komtek Forge.

3. Policy Statement

Komtek Forge is committed to:

- Ethical sourcing: We strive to ensure that conflict minerals used in our forging processes do not originate from conflict-affected and high-risk areas, unless sourced through validated and certified conflict-free supply chains.
- Compliance: We comply with Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and any applicable international standards.
- Transparency: We expect full cooperation from our supply chain in providing detailed traceability and due diligence documentation.
- Risk Mitigation: If we identify any suppliers sourcing from non-compliant smelters or refineries, we will take immediate action, including remediation or discontinuation of business.

4. Supplier Expectations

Suppliers are required to:

- Conduct due diligence using the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Complete Conflict Minerals Reporting Templates (CMRT) provided by the Responsible Minerals Initiative (RMI).
- Source materials only from smelters or refiners validated by recognized programs such as the RMAP (Responsible Minerals Assurance Process).
- Notify Komtek Forge immediately of any changes in mineral sourcing that may affect compliance with this policy.

5. Continuous Improvement

Komtek Forge will continuously:

Komtek Forge

- Monitor regulatory updates and best practices.
- Train internal procurement and compliance teams.
- Audit and evaluate supplier compliance annually or as needed.

6. Enforcement and Accountability

Non-compliance with this policy may lead to:

- Corrective action plans,
- Suspension or termination of supplier relationships, and/or
- Reporting to regulatory authorities, if required.

7. Contact Information

For questions or to report violations of this policy, please contact:

Compliance Officer
Jonathan Plank
jplank@komtek.com

Jonathan Plank