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Corporate Conflict Minerals Policy For UniMetal Surface Finishing LLC 2/2/2024

Prepared in compliance with

Responsible Business Alliance (RBA)

The Global e-Sustainability Initiative

Conflict-Free Smelter Program

And the

Dodd-Frank Bill



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It is the practice & policy of UniMetal Surface Finishing LLC to purchase all metals used in our process from reliable, sustainable and conflict -free sources throughout the globe. In order to meet this standard, we will:

Endeavor to certify that all potential conflict minerals suppliers have completed their due diligence in the sourcing of their raw materials and have supplied us with documentation to support this effort.

Maintain a current listing of these suppliers and the associated certifications on file for our customers so that they may also complete their required due diligence.

If, at any time we receive credible evidence that there may be inappropriate or questionable materials introduced to our supply chain, we will initiate an internal investigation to determine the source of said materials.

If it has been determined a supplier is found to be supplying minerals from one of the areas of concern, such as the DRC and the surrounding countries, we will inform the supplier of our findings and issue a corrective action requesting additional information to dispute the findings.

Should a supplier be unable to provide evidence to dispute the findings, the supplier will be given 90 days to procure another, certifiable source or risk losing preferred supplier status.

If, after the 90 days has elapsed, the supplier has failed to provide the necessary documentation, UniMetal will cease placing orders with said supplier until such time as they can certify their metals as conflict-free.

This policy shall remain in place until federal legislation requires us to modify or replace it.

Kim Bonatsos

Supply Chain Leader

UniMetal Surface Finishing LLC

George A. LaCapra Jr.

President

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Patrick Hayden

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UniMetal Surface Finishing LLC