



Responsible Minerals Policy & Reporting Guidelines

Policy Statement

We are committed to ensuring our products do not contain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or adjoining countries, or contribute to human rights abuses in mineral supply chains. This commitment covers both conflict minerals (tin, tungsten, tantalum, and gold, collectively known as 3TG) and cobalt, which has been linked to similar humanitarian concerns in the DRC region.

Conflict minerals have been linked to severe human rights abuses, including forced labor, child labor, and the funding of armed conflicts that have resulted in millions of casualties. Additionally, cobalt mining in the DRC has raised significant humanitarian concerns, particularly regarding child labor and hazardous working conditions. Through responsible sourcing practices and supply chain transparency, we aim to prevent our business operations from contributing to these humanitarian crises.

Our company recognizes that responsible mineral sourcing extends beyond regulatory compliance to encompass broader ethical considerations and human rights protections throughout our global supply chain.

Regulatory Background

The Dodd-Frank Wall Street Reform and Consumer Protection Act Section 1502 requires companies to conduct due diligence on the source and chain of custody of conflict minerals used in their products. This includes:

- Gold, columbite-tantalite (tantalum), cassiterite (tin), and wolframite (tungsten) (collectively "3TG")
- Minerals sourced from the Democratic Republic of Congo (DRC) or adjoining countries
- Materials that would trigger violations of U.S. Executive Order 13671

While cobalt is not regulated under the Dodd-Frank Act, industry standards and stakeholder expectations increasingly require transparency in cobalt sourcing due to documented human rights risks in the supply chain.

Vendor Requirements

1. Supply Chain Due Diligence

Vendors supplying products containing 3TG minerals and/or cobalt must:

- Implement a supply chain policy covering both conflict minerals and cobalt
- Conduct reasonable country of origin inquiries for these minerals
- Perform supply chain due diligence following internationally recognized frameworks
- Document and maintain records of due diligence efforts

2. Reporting Requirements



Vendors must:

- Complete and submit the [Conflict Minerals Reporting Template](#) (CMRT) annually for 3TG minerals
- Complete the [Extended Minerals Reporting Template](#) (EMRT) for cobalt when requested
- Provide annual updates if there are significant changes in the supply chain
- Respond to additional information requests within reasonable timeframes
- Maintain documentation supporting their CMRT and EMRT submissions

3. Timeline and Submission Process

- Annual CMRT submissions are due by December 31st of each calendar year
- EMRT submissions will be requested as needed based on customer requirements
- Updated reports must be submitted within 30 days of any significant supply chain changes
- Submit completed templates to ESG@4implus.com

Compliance Verification

We reserve the right to:

- Review submitted documentation
- Request additional information or clarification
- Conduct supply chain verification activities
- Require corrective actions for non-compliance

Policy Updates

These guidelines may be updated periodically to reflect regulatory changes, industry standards, or program improvements. Vendors will be notified of significant changes affecting reporting requirements.