

Flexitallic Conflict Minerals Policy

Our Commitment

Flexitallic, S.a.r.l., The Flexitallic Group, SAS, FGI Acquisition Corporation, SIEM Supranite SAS, Novus Finance, Ltd, New Seal Finance, Ltd. and all their respective subsidiary and affiliated companies (collectively “Flexitallic”) are committed to sourcing components and materials from companies that share our values regarding respect for human rights, integrity and environmental responsibility.

Flexitallic is committed to complying with all global rules, regulations and statutes which aim to prevent the use of minerals (tantalum, tin, tungsten and gold) that, directly or indirectly, finance or benefit armed groups in the Democratic Republic of the Congo (“DRC”) or any adjoining countries (“Conflict Minerals”).

Flexitallic will not purchase any raw materials, components or products that are or contain Conflict Minerals.

All our suppliers are expected to understand the due diligence steps they can and should take to investigate the source of any Conflict Minerals in the raw materials, components and products they supply to Flexitallic. Flexitallic will not continue to source any raw materials, components or products from any supplier who fails to implement reasonable steps to transition to Conflict-Free sources.

Flexitallic expects its suppliers to:

1. Source any tantalum, tin, tungsten, gold or other mineral that meets the definition of Conflict Minerals from a source that is DRC Conflict-Free:
2. Develop their own Conflict Minerals policies, due diligence frameworks, and management systems that are designed to prevent Conflict Minerals from being included in raw materials, components and products sold to Flexitallic.
3. Maintain reviewable business records supporting the source of any tantalum, tin, tungsten, gold or other mineral that meets the definition of Conflict Minerals.
4. Readily provide to Flexitallic information Flexitallic may request, from time to time, regarding the origin of any tantalum, tin, tungsten, gold or other mineral that meets the definition of Conflict Minerals.

Any supplier of Flexitallic who fails to comply with any element of this Policy will be subject to review of its actions or inactions, as the case may be, and Flexitallic may in its sole discretion take any appropriate action, including termination its relationship with the supplier.

This Policy is not intended in any way to grant any additional rights to a Flexitallic supplier or modify or limit any exercise of Flexitallic’s legal or contractual rights against a supplier.

Reporting Concerns, Asking Questions

We are all responsible for protecting our culture of Integrity. A potential violation is a serious matter. If you see something or are unsure if something potentially violates our this Flexitallic Conflicts Minerals Policy, speak up!

We expect everyone to let us know about any suspected violation of our Conflicts Minerals Policy.

We do not tolerate retaliation against anyone for raising good faith concerns.

How do I make a report or raise a concern about potential violations of this Conflicts Minerals Policy?

If you have a question about this Conflicts Minerals Policy or you are concerned about a potential violation of this Policy, you have a number of options:

1. Discuss the issue with your supervisor;
2. Discuss the issue with another supervisor or manager; or
3. Contact your Human Resources Department or the Legal Department ¹

You may contact the Human Resources Department or the Legal Department to report concerns or ask questions confidentially.

No Retaliation Policy

Flexitallic does not tolerate retaliation for asking questions or raising good-faith concerns of possible violations of the Conflicts Minerals Policy.

Your concerns are taken very seriously. We will investigate reports of possible violations of this Policy or any other Corporate Governance Policy. All employees are expected to fully cooperate with all such investigations conducted by the Company. Violations of the Conflicts Minerals Policy are subject to disciplinary action up to and including termination.

¹ The contact information for the Legal Department is:

Howard R. King
Phone: (281) 604-2586
Mobile: (832) 544-0737
Email: hking@flexitallic.com

Document Revision History	
2/3/2024	Document Created