Responsible Minerals Sourcing Policy

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Status: Approved / Controlled Policy

Connor-Winfield is committed to responsible mineral sourcing and to avoiding purchases that contribute to armed conflict or serious human rights abuses. This policy sets expectations for our procurement decisions, supplier cooperation and customer reporting. It updates our legacy Conflict Materials Policy.

Scope and sourcing commitment

This policy covers minerals in materials, components and finished products purchased for Connor-Winfield operations, including Janus Remote Communications where applicable. It addresses tin, tantalum, tungsten and gold (3TG), including minerals embedded in purchased parts. It also addresses other minerals when identified through supply-chain risk review, applicable requirements or customer requests. Our due diligence approach is guided by the OECD minerals guidance and adapted to CW's position as a downstream electronics manufacturer and our influence over suppliers. We seek responsible sourcing from any location; origin in a conflict-affected or high-risk area does not, by itself, establish that a mineral finances conflict. We do not impose a blanket exclusion of responsibly sourced minerals from such areas.

Supplier expectations

CW expects relevant suppliers to maintain responsible-sourcing policies, apply due diligence to their own supply chains and communicate these expectations upstream. Suppliers shall provide accurate, current information within an agreed reporting scope, identify unknowns, and cooperate with reasonable follow-up requests. Supplier information should identify relevant minerals, countries of origin and smelters, refiners or processors where reasonably available. Reporting must distinguish company-wide data from information tied to the products supplied to CW. A general supplier declaration is not automatically proof of the origin of every component. Suppliers should use the current appropriate Responsible Minerals Initiative (RMI) reporting template: the CMRT for 3TG, the EMRT for its designated extended minerals, and the AMRT for agreed minerals outside those scopes. CW will confirm the applicable minerals and template version for each reporting cycle rather than fixing a version in this policy.

Information review

Purchasing and Quality will review relevant supplier responses for completeness, consistency, scope and unresolved risks. Where available and appropriate, CW will consider independent smelter or refiner assessments, including the Responsible Minerals Assurance Process (RMAP). Assessment status supports due diligence; it does not certify CW or guarantee a specific product's mineral origin. Page 2 of 2

Risk response

CW will assess reported risks and escalate material concerns to management. Issues include abusive labor practices and other grave harm to people, support for armed groups, misconduct by security providers, corrupt payments, falsified origin records and financial crime. Suppliers must promptly disclose material sourcing changes or credible concerns affecting products supplied to CW. Where credible serious abuse or support for non-state armed groups is identified, CW will promptly suspend or discontinue the affected sourcing relationship in a manner consistent with the OECD guidance. For other remediable risks, CW will seek a documented improvement plan with an owner, deadline and evidence of progress; unresolved or unacceptable risk may lead to suspension or disengagement. Decisions will consider the severity of harm and the consequences of continued sourcing or withdrawal.

Customer reporting and transparency

CW will respond to reasonable customer requests using reviewed supplier information and applicable reporting templates. Each response will identify its reporting period, product or company scope, and known limitations. Missing information will be reported as unknown and followed up; it will not be represented as an absence of risk. This policy expresses sourcing commitments and expectations. It is not a product certificate, an independently audited assurance report, or a blanket declaration that all CW products are conflict-free. Product-specific statements require supporting evidence. CW will meet applicable legal obligations and accepted customer requirements; this policy does not assert that a particular statutory filing duty applies to CW.

Responsibility review and concerns

Purchasing will coordinate supplier inquiries and follow-up. Quality will review declarations, supporting evidence and customer responses. Management will approve this policy, resolve significant sourcing decisions and provide appropriate resources. CW will retain relevant records for at least five years, or longer where applicable requirements or contracts demand, and review this policy annually and after significant changes. Customers and suppliers may raise sourcing questions or concerns through their established CW contact or at sales@conwin.com, for referral to Quality and management. CW will review good-faith concerns, protect confidentiality as practicable and prohibit retaliation against those raising them.

Reference framework

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, 2016, including its five-step framework and Annex II risk principles. OECD practical guidance. Responsible Minerals Initiative: current reporting templates and independent facility assessment resources. References checked October 9, 2026.

Policy owner: Purchasing and Quality. **Document control:** Revision 1, effective October 14, 2026. This approved policy updates the legacy Conflict Materials Policy.