

Supply Chain Policy Alpha Assembly Solutions Inc. (Altoona)

This policy applies to Alpha Assembly Solutions Inc. (“Alpha” or the “Company”) and its Altoona facility, including its supply chain, and covers sourcing in the Democratic Republic of the Congo and its adjoining countries as well as other conflict-affected, high-risk areas around the world, as determined from time to time.

Alpha Values

Alpha believes it is essential to establish validated, Conflict-Free sources of gold, columbite-tantalite, cassiterite, and wolframite (collectively, including their derivatives, tantalum, tin and tungsten and any other minerals identified from time to time, the “Conflict Minerals”), so that these minerals can be procured in a way that contributes to economic growth and development, rather than to conflict.

In this context, Alpha engages in rigorous due diligence efforts designed to verify - whenever possible - the source of Conflict Minerals used in its supply chain. Alpha is committed to purchasing Conflict Minerals and other materials only from environmentally and socially responsible suppliers that do not finance or benefit armed conflict or human rights abuses.

In support of this policy, Alpha aims at preventing or mitigating all associated risks:

- established a supply chain compliance program and a risk-based due diligence* process based on applicable Conflict Minerals rules and regulations and as outlined in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”);
- works with its supply chain partners to trace the sources of Conflict Minerals in its products as part of its efforts to eliminate materials deemed to originate from a conflict region (to the extent not responsibly sourced), as Alpha will neither tolerate nor knowingly contribute to any serious abuses**;
- review, suspend and/or discontinues engagement with suppliers posing a reasonable risk by sourcing from, or being linked to, any party committing serious abuses or other risks***;
- adopted practices and tools from the Responsible Minerals Initiative; and
- commits to the due diligence steps**** outlined within the Tin Supplement of the OECD Guidance.

Supplier Commitment

Alpha expects and requires its suppliers to identify and conduct appropriate supply chain due diligence on any Conflict Minerals supplied to Alpha, determine the source of any such Conflict Minerals and provide the Conflict Minerals source information necessary to support Alpha’s own due



diligence and reporting obligations to its parent, Element Solutions Inc. Suppliers must also cooperate with Alpha to make available to Alpha and/or its agents full material declarations and other relevant documentation that identify the sources and amount of all Conflict Minerals contained in Alphas' products. In connection with any transaction involving Conflict Minerals, Alpha requires all suppliers to provide a Conflict Minerals Certification.

Alpha encourages individuals or suppliers who have any questions relating to this policy or who wish to report possible violations of this policy to contact their Alpha representative. You may also reach out to the Compliance Department of Alpha by contacting **Ari Bricker** at conflict_minerals@elementsolutionsinc.com.

As a leading global producer of high quality and reliable products to the electronics assembly industry, Alpha is committed to ensuring the safety, health and protection of people and the environment worldwide.

***Risk Based Due Diligence** includes validating all new and existing supplier relationships by intelligently identifying risk exposure and mitigation throughout our supply chain and using a multi-level risk model managing multiple risk domains. When any relevant risks or abuses are identified, we will, in accordance with our position in the supply chain, engage with suppliers, relevant authorities, international organizations, and any affected third parties.

****Serious Abuses** include:

1. any forms of torture, cruel, inhuman and degrading treatment;
2. any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
3. the worst forms of child labor;
4. other gross human rights violations and abuses such as widespread sexual violence;
5. war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

*****Other Risks** include:

1. direct or indirect support to non-state armed groups;
2. direct or indirect support to public or private security force who illegally control mine sites, transportation routes and upstream actors in the supply chain;
3. bribery and fraudulent misrepresentation of the origin of minerals;
4. money laundering;

******Due Diligence Steps** are outlined in detail within our [Public Due Diligence Report](#).