

CONFLICT MINERALS SOURCING POLICY

1. Purpose

Special T Mfg. is committed to responsible sourcing practices and to ensuring that our products do not directly or indirectly finance or benefit armed groups in conflict-affected regions. This policy outlines our approach to sourcing minerals that may originate from the Democratic Republic of the Congo (DRC) or adjoining countries, consistent with Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

2. Scope

This policy applies to all Special T Mfg. operations, subsidiaries, and suppliers that provide materials, components, or products containing tin (Sn), tantalum (Ta), tungsten (W), or gold (Au) — collectively referred to as “3TG minerals.”

3. Policy Statement

Special T Mfg. does not knowingly source 3TG minerals that fund or benefit armed groups in the DRC or adjoining countries.

We require our suppliers to conduct due diligence on the source and chain of custody of 3TG minerals in their supply chains.

We expect all suppliers to source 3TG minerals only from smelters and refiners that are certified as conflict-free by recognized industry programs (e.g., the Responsible Minerals Initiative’s RMAP).

Suppliers must provide accurate and timely information using the Conflict Minerals Reporting Template (CMRT) or equivalent documentation.

We are committed to continuous improvement in our due diligence practices and transparency in our supply chain.

4. Supplier Expectations

Suppliers to Special T are expected to:

- Implement and maintain their own responsible minerals sourcing policy.
- Conduct due diligence consistent with the OECD Guidance.
- Cooperate with Special T Mfg.’s information requests regarding the origin and processing of 3TG minerals.
- Take corrective actions if risks or non-conformances are identified.

5. Reporting and Transparency

We disclose our conflict minerals due diligence efforts annually, consistent with applicable regulations (e.g., SEC Rule 13p-1).

6. Continuous Improvement

Special T Mfg. will work with industry peers, suppliers, and other stakeholders to improve supply chain transparency and promote responsible sourcing globally.

Approved by:

Josh Reeves, CEO

11/13/25