

Conflict Minerals Policy

Introduction

Westcontrol is committed to ethical sourcing and responsible supply chain management. We recognize the importance of ensuring that minerals used in our products are sourced in a manner that respects human rights and does not contribute to conflict. While we are not directly subject to Section 1502 of the U.S. Dodd-Frank Act or the EU Conflict Minerals Regulation, we voluntarily adhere to responsible sourcing principles in response to customer expectations and industry best practices. Our company reports on conflict minerals due diligence to relevant stakeholders and continuously improves our efforts to promote supply chain transparency.

Scope and Definitions

This policy applies to tin (Sn), tungsten (W), tantalum (Ta), gold (Au), and commonly referred to as 3TG. These minerals are sometimes linked to human rights violations and conflict financing, particularly in Conflict-Affected and High-Risk Areas (CAHRA), as identified by the EU Conflict Minerals Regulation, including but not limited to the Democratic Republic of the Congo (DRC) and adjoining countries. We are committed to gathering and reviewing supply chain data to ensure responsible sourcing.

Commitment to Ethical Sourcing

Although Westcontrol does not directly source minerals, we work with suppliers who provide materials used in our manufacturing processes. We are dedicated to ethical sourcing practices and follow a due diligence process utilizing the Conflict Minerals Reporting Template (CMRT) to assess the origins of minerals in our supply chain. This is in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Legal Compliance and Industry Best Practices

While not legally required to comply with Section 1502 of the Dodd-Frank Act or the EU Conflict Minerals Regulation, we actively track emerging laws and industry best practices related to conflict minerals. Our commitment includes:

- Supporting due diligence efforts conducted by our clients and supply chain partners.
- Aligning our reporting processes with OECD and RMI frameworks to enhance transparency.



Supplier Expectations

We expect our suppliers to establish policies and due diligence frameworks that align with RMI and OECD guidance. Specifically, suppliers should:

- Implement policies that ensure responsible mineral sourcing.
- Conduct due diligence on the origin of minerals in their supply chains.
- Provide transparency regarding their mineral sourcing practices through compliance with industry reporting frameworks.

Given the complexity of global electronics supply chains, we acknowledge that eliminating all conflict minerals is challenging. However, we expect our suppliers to take reasonable steps to ensure minerals used in their products are sourced responsibly.

Conclusion

Westcontrol is committed to working with our suppliers, customers, and industry partners to promote responsible sourcing of conflict minerals. We will continue to evaluate and enhance our due diligence efforts to align with evolving regulations and best practices, ensuring ethical and transparent supply chain management.

Signatures:

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