

CONFLICT MINERALS

Anderson Power Products, Inc., Conflict Minerals Policy

We conduct our activities in a manner that reflects our Code of Conduct and Values, which include being a good corporate citizen, dealing fairly in business, behaving ethically, supporting basic human rights and a safe and healthy workplace, doing business in an environmentally responsible manner, and complying with applicable laws. We expect our suppliers to adhere to the same high standards and we are committed to ensuring that our supply chain reflects our values and beliefs through our Supplier Code of Conduct.

Conflict Minerals

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”), among other things, obligates regulated companies like Anderson Power to report their use of tin, tantalum, tungsten, and gold (“Conflict Minerals”) extracted in the Democratic Republic of Congo and adjoining countries (“DRC region”). Anderson Power supports the stated goal of the Dodd-Frank Act of preventing armed groups in the DRC region from profiting from the sale of Conflict Minerals. Anderson Power is concerned with the use of these Conflict Minerals and supports efforts to source responsibly and to increase supply chain transparency. Greater transparency is available through audit and certification initiatives such as the Responsible Minerals Initiative (RMI) program.

Anderson Power expects its suppliers to develop internal Conflict Mineral policies, due diligence frameworks, and management systems that meet the minimum requirements of the OECD guidelines. Suppliers’ Conflict Minerals programs must be designed to identify and eliminate from use in products sold to Anderson Power any Conflict Minerals which are known to come from sources funding armed groups in the DRC region. Anderson Power Lighting is committed to working with its suppliers on ways in which they can increase the transparency regarding the origin of these minerals contained in products sold to Anderson Power. To further enhance transparency, Anderson Power requires its direct suppliers to source minerals from smelters and refiners validated as conflict-free or in pursuit of conflict-free validation by an independent third-party audit program, such as the RMI or a mutually agreed equivalent.

Anderson Power fully expects our suppliers to cooperate with us and to provide information to support these efforts, even if the supplier is not directly

subject to the Dodd-Frank Act. Any Anderson Power supplier that does not provide us complete and accurate information in an acceptable format for the applicable reporting period or that provides material from sources known to fund armed groups in the DRC region will be required to implement corrective action measures. Suppliers that do not reasonably comply with Anderson Power's Conflict Mineral Policy will be reviewed by Anderson Power's supply chain management to assess whether Anderson Power will conduct business with those suppliers in the future.

Cobalt Statement

Anderson Power continues to expand its visibility into conflict minerals to increase transparency and develop its due diligence systems to apply to the sourcing of materials beyond those defined as conflict minerals. Through industry-coordinated approaches and using the tools and programs of the Responsible Minerals Initiative, Anderson Power plans to undertake a comprehensive mapping of our cobalt supply chain to understand our exposure and consider responses in line with the OECD Due Diligence Guidance.

In 2023, Anderson Power will publish a Responsible Minerals Sourcing policy and will survey applicable suppliers in our supply chain to increase the visibility of cobalt management.

-
- [CMRT Document APP Web site](#)