

## Conflict Minerals Policy Statement (Updated 2026)

### INTRODUCTION

The extraction and trade of certain minerals in the Democratic Republic of Congo (DRC) and adjoining countries—as well as other Conflict-Affected and High-Risk Areas (CAHRAs) worldwide—have been linked to human rights abuses and the funding of illegal armed groups.

In accordance with **Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act**, SEC regulations, and the **EU Conflict Minerals Regulation**, Bel Aerospace & Defense is committed to ensuring that its supply chain is transparent and ethical. This policy aligns with Bel Aerospace & Defense's mission of promoting human flourishing and maintaining the highest standards of business conduct and ethical principles.

### DEFINITIONS

- **Conflict Minerals:** Defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives: **tantalum, tin, and tungsten (3TG)**. This definition includes any other minerals or derivatives subsequently designated by the U.S. Secretary of State or relevant international authorities as financing conflict.
- **DRC Adjoining Countries:** Countries bordering the DRC, including Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.
- **CAHRAs (Conflict-Affected and High-Risk Areas):** Areas in a state of armed conflict, fragile post-conflict regions, or areas with weak/non-existent governance and systematic violations of international law.
- **DRC Conflict-Free:** Parts or components that do not contain conflict minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries.
- **Recycled/Scrap Sources:** Minerals obtained from reclaimed end-user or post-consumer products, or scrap processed metals created during manufacturing. These are considered "Conflict-Free" provided they meet the criteria for verified recycled content.

### POLICY

Bel Aerospace & Defense is committed to conducting its global operations in full compliance with applicable laws regarding conflict minerals. To achieve this, Bel Aerospace & Defense will:

- **Supplier Engagement:** Inform all direct suppliers of this policy and require alignment with our Supplier Code of Conduct.
- **Chain of Custody:** Collaborate with suppliers to identify the chain of custody for 3TG minerals, targeting transparency down to the smelter or refiner (SOR) level.
- **Due Diligence:** Conduct reasonable due diligence in alignment with the **OECD Due Diligence Guidance** for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- **Sourcing Strategy:** Take proactive measures to source parts and components from suppliers validated as "Conflict-Free" by recognized third-party audit programs (e.g., the Responsible Minerals Assurance Process - RMAP).
- **Continuous Improvement:** Work with suppliers to improve their sourcing performance, aiming for a supply chain that is 100% validated as conflict-free.

## SUPPLIER REQUIREMENTS

Suppliers to Bel Aerospace & Defense are expected to:

- Maintain compliance with SEC and international regulations related to conflict minerals and provide all necessary declarations (e.g., the Conflict Minerals Reporting Template - CMRT).
- Implement their own conflict mineral policies and management systems, cascading these requirements down to their sub-tier suppliers.
- Source only from smelters and refiners that have been validated as conflict-free by independent third-party audit bodies.
- Maintain all relevant "Chain of Custody" data for a minimum of **five (5) years** and provide such documentation to Bel Aerospace & Defense upon request.
- Ensure a response rate to Bel Aerospace & Defense's inquiries regarding mineral origins of at least **75%** (as an interim performance metric) while striving for total transparency.

## COMPLIANCE & NON-COMPLIANCE

This policy applies to all Bel Aerospace & Defense global operations. Employees involved in procurement and supply chain management are required to adhere to these guidelines.

In cases of **Non-Compliance**, Bel Aerospace & Defense will work with the supplier to implement corrective actions. Bel Aerospace & Defense reserves the right to suspend or terminate relationships with suppliers who fail to comply with this policy or who fail to demonstrate a commitment to ethical sourcing.

## REPORTING & CONTACT

- **Violations:** Potential violations should be reported to supervisors, unit management, or the **Center for Global Business Conduct**.
- **Inquiries:** General questions regarding this policy should be directed to the **Bel Aerospace & Defense Manager of Compliance in Supply Management**.

### Critical and Battery Minerals:

Beyond 3TG, Bel Aerospace & Defense recognizes the importance of responsible sourcing for minerals essential to the energy transition, specifically **Cobalt** and **Lithium**. These minerals are subject to enhanced due diligence to address environmental risks, forced labor, and child labor in line with the **EU Battery Regulation (2023/1542)**.

Management Signature: \_\_\_\_\_

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