	Document Title:	Document Number:	CCE_ESG_003
	Conflict Minerals Policy	Process Owner:	Human Resources Manager
		Revision Number:	003
		Revision Date:	Nov. 28, 2025

**Policy document number has changed from CCE_HR_011 to CCE_ESG_003 to align with the ESG structure*

Conflict Minerals Policy

Purpose - Markdom is committed to responsible business conduct, transparency, and respect for human rights throughout our operations and supply chain. This policy outlines our commitment to preventing the use of minerals that directly or indirectly finance armed conflict or contribute to human rights abuses.

We fully support the objectives of Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and the global goal of eradicating armed conflict financing in the Democratic Republic of the Congo (DRC) and adjoining regions through responsible mineral sourcing.


Scope - This policy applies to all Markdom operations, employees, contractors, suppliers, vendors, and business partners involved in the sourcing, procurement, or production of components or materials containing tin, tantalum, tungsten, or gold (3TG).

Policy Statements - Markdom is committed to:

- Eliminating human rights abuses associated with the extraction, transport, or trade of conflict minerals. UNGC principles 1-2
- Prohibition of forced and child labour UNGC principles 4-5
- Prohibiting direct or indirect support to armed groups or security forces that control mining or trade routes in the DRC and surrounding countries.
- Ensuring transparency in our mineral supply chain through responsible sourcing and supplier engagement.
- Prohibiting bribery, corruption, and money laundering related to the mineral trade. UNGC Principle 10
- Requiring supplier due diligence to ensure sourcing only from verified conflict-free smelters and refiners.
- Complying with all applicable legislation governing conflict minerals and ethical supply chain practices.

Supplier Engagement & Accountability - Markdom expects all suppliers to:

- Establish internal policies and management systems aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals.

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- Respond accurately and promptly to Conflict-Free Sourcing Initiative (CFSI) / Responsible Minerals Initiative (RMI) inquiries using the Conflict Minerals Reporting Template (CMRT).
- Source 3TG minerals exclusively from conflict-free validated smelters or refiners.
- Maintain traceability systems to ensure transparency throughout their supply chain.
- Support training and awareness programs on responsible sourcing.
- Commit to corrective actions if non-compliance is identified or risk factors emerge.

If a supplier is found to be in violation of this policy, Markdom will require a corrective action plan within a defined timeframe. Failure to remediate may result in termination of the relationship.

Due Diligence and Monitoring - Markdom will:


- Conduct annual supplier risk assessments, supplier surveys and due diligence.
- Review our sourcing supply chain to identify any minerals that may qualify as “conflict minerals” under the SEC rules. Information will be requested from suppliers as appropriate.
- Maintain a database of material composition and smelter data.
- Publish annual progress reports on responsible mineral sourcing in our sustainability disclosures.

If we determine that a supplier may be violating this policy, we may require them to commit to and implement a corrective action plan within a reasonable timeframe, or we may terminate our business relationship with such supplier.

Objectives and Targets


Objective	Target / KPI	Timeframe	Responsible
Conflict-Free Supply Chain	Source 3TG minerals from 100% conflict-free smelters/refiners	By 2026	HR / Procurement
Supplier Due Diligence Coverage	Achieve 100% supplier due diligence and monitoring	By 2026	HR / Procurement
Training & Awareness	Train 100% of procurement and compliance teams on responsible sourcing standards	By 2026	HR / Procurement
Transparency & Reporting	Publish an annual Conflict Minerals Report and promote transparent reporting	By 2026	HR / Procurement

Reporting: Any stakeholder, employee, or supplier may confidentially report concerns related to conflict minerals sourcing, corruption, or human rights violations via Markdom’s Markdom Speak

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Up Form or through HR channels. Reports will be handled confidentially and without retaliation.

They can use:

- ✓ The [MARKDOM SPEAK UP / REPORTING](#)  [FORM – Fill out Form](#)
- ✓ Use the QR
- ✓ Email at hr@markdom.com

Policy Review

This policy will be reviewed annually or as required by legal, regulatory, or operational changes. Updates will be communicated to all relevant stakeholders and suppliers to ensure continuous alignment with best practices

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RECORD OF REVIEWS

Date	Revision Description	Approved By	Revision Level
1/20/2024	Released Policy	HR Manager - Johanna Agaton	001
02/20/2025	Added Target Annual Revision, signed by GM	HR Manager General Manager	002
11/28/2025	Aligned with UNGC principles Added targets and goals Due Diligence and reporting	HR Manager - Johanna Agaton VP Global Operations – Billy Z.	003