



## **CONFLICT MINERALS POLICY STATEMENT**

### **Responsible Sourcing of Tin, Tantalum, Tungsten and Gold (3TG)**

Halsit Holdings, LLC dba Abbatron

#### **Purpose**

Halsit Holdings, LLC dba Abbatron is committed to responsible sourcing, ethical business practices, and appropriate supply-chain due diligence.

This policy describes our approach to conflict minerals reporting and responsible sourcing of tin, tantalum, tungsten and gold (3TG) used in products, components, materials, plating, and manufacturing processes within our supply chain.

#### **Regulatory Background**

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and related U.S. Securities and Exchange Commission (SEC) rules established disclosure requirements concerning certain products containing tin, tantalum, tungsten or gold when those minerals originate from the Democratic Republic of the Congo (DRC) or adjoining countries.

The purpose of these requirements is to promote transparency regarding mineral sourcing and reduce the risk that mineral extraction and trade may directly or indirectly finance or benefit armed groups.

#### **Our Position in the Supply Chain**

We manufacture and supply electronic and electromechanical components and purchase materials, components, plating services, and other manufacturing inputs from multiple suppliers. We do not directly purchase 3TG minerals from mines, smelters or refiners.

Because of our position downstream in the supply chain, we generally do not have direct relationships with the mines, smelters or refiners that process the minerals ultimately incorporated into materials or components supplied to us.

Accordingly, conflict minerals due diligence necessarily relies substantially upon information obtained from our direct suppliers and, in turn, information available to those suppliers from their upstream supply chains.

#### **Due Diligence Approach**

We support responsible sourcing practices and conduct reasonable supply-chain due diligence appropriate to our position in the supply chain.



- Requesting conflict minerals information from applicable suppliers;
- Conducting a Reasonable Country of Origin Inquiry (RCOI) where appropriate;
- Reviewing supplier responses and available supporting documentation;
- Utilizing the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) as the standardized reporting framework;
- Encouraging suppliers to conduct appropriate due diligence within their own supply chains; and
- Reviewing available smelter and refiner information when such information is provided by our suppliers.
- Our due diligence approach is intended to be consistent with the principles of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

### **Supplier Expectations**

We expect applicable suppliers to support responsible mineral sourcing and to provide accurate and reasonably complete information concerning 3TG contained in materials, components, or services supplied to us.

- Conduct appropriate due diligence within their supply chains;
- Obtain sourcing information from their upstream suppliers;
- Utilize current RMI reporting tools where appropriate;
- Identify known smelters and refiners when such information is reasonably available; and
- Work toward sourcing from responsible smelters and refiners.
- Suppliers should notify us if they become aware of material information that changes previously provided conflict minerals declarations.

### **Smelter and Refiner Information**

Because we do not purchase minerals directly from smelters or refiners, smelter-level information is dependent upon disclosures received through multiple tiers of the supply chain.

We therefore cannot independently verify or guarantee complete smelter or refiner traceability for every material or product. Where smelter or refiner information is provided by suppliers, it may be evaluated using information and resources made available through the Responsible Minerals Initiative and other recognized responsible-sourcing programs.

### **Conflict-Free Representations**

We do not knowingly source materials for the purpose of financing or benefiting armed groups. However, because our conflict minerals information is dependent upon supplier declarations and information obtained through multiple levels of the supply chain, we do not make an unconditional representation that every material, component or product is universally "DRC conflict free" unless sufficient supporting information is available to substantiate such a determination.



This approach is intended to provide customers with accurate information without making representations beyond the information reasonably available to us.

### **Conflict Minerals Reporting Template**

We maintain a company-level Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT) based upon information reasonably available from our supply chain.

A copy of our current RMI Conflict Minerals Reporting Template (CMRT) is available through the Certifications & Compliance Statements page: <https://www.abbatron.com/certifications-compliance-statements>.

The policy intentionally refers to the "current CMRT" rather than identifying a particular revision so that the policy remains applicable when RMI releases future template revisions.

The CMRT provides standardized information regarding:

- Tin;
- Tantalum;
- Tungsten;
- Gold;
- Applicable company-level sourcing declarations; and
- Available smelter and refiner information.

### **Scope of Reporting**

Unless otherwise agreed in writing, conflict minerals reporting is provided at the company level. We do not routinely maintain product-level CMRTs, individual SKU-level smelter declarations, or complete material declarations for individual catalog products. Product-specific reporting requirements should be established by written agreement at the time of purchase and are subject to our Compliance Documentation Policy.

### **Continuing Review**

Responsible minerals sourcing requirements, RMI reporting tools, supplier information, and regulatory expectations continue to evolve. We periodically review our conflict minerals policy and reporting practices and may update our CMRT or this policy when appropriate based upon changes in applicable regulations, updates to RMI reporting tools, new or revised supplier information, or changes in our supply chain. This policy reflects information reasonably available to us as of the revision date below and is subject to change as additional supply-chain information becomes available.



**Document Revision Date: August 2026**

Sincerely,

*James A. Sitter*

James A. Sitter

President

Halsit Holdings, LLC dba Abbatron

jsitter@abbatron.com