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Conflict Minerals policy

“Conflict minerals,” include the metals tantalum (Ta), tin (Sn), tungsten (W) and gold (Au), which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively. These four conflict minerals are often referred to the extracts of these minerals as 3TG.

Conflict minerals emanating from the Democratic Republic of Congo (DRC) and adjoining countries have been identified as products and revenues of such mining operations that may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses.

Morgan Advanced Materials ("Morgan") complies with all laws related to conflict minerals and does not support sourcing of conflict minerals originating from countries that are involved in or contributing to illegal armed groups, human rights violations, or financial wrongdoings. Morgan has confirmed through a review request of each of our manufacturing operations and a review of current procurement mechanisms that the materials we source to produce our products do not include and are not composed of, conflict minerals.

As part of our strategic sourcing process, we include a due diligence risk assessment of our suppliers. The risk assessment includes information related to each supplier's policies, as well as training and verification practices regarding those policies. The assessment also includes information requests about their Conflict Minerals Policy. We expect all our suppliers to comply with our Supplier Code of Conduct and all applicable regulations pertaining to Conflict Minerals.

As stated in the Morgan Code, we seek to ensure our customers and suppliers operate in a responsible way, that their workers are safe and treated fairly and that environmental and social impacts are taken into consideration during the sourcing process. Therefore, we are dedicated to working with our customers and suppliers to ensure they source our materials used in the manufacture of our products in a responsible manner. We have reviewed use of these materials and will continue to review their use in our products and our global supply chain. Morgan will adhere to the requirements as defined in the EU Conflict Minerals Regulation 2017/821 and follow the general principles set forth in the OECD's Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "[OECD Guidance](#)").

Morgan will work to:

- Maintain a strong supply chain management system;
- Identify and assess risks within our supply chain; and
- Implement strategies to respond to identified risks.

As part of managing our supply chain, we strongly encourage our suppliers to:

- assist us in complying with regulations related to conflict minerals by providing related information; as requested
- establish conflict minerals policies that are consistent with the OECD Guidance;
- undertake all reasonable due diligence within their supply chains to determine the origin of conflict minerals and meet all applicable regulatory reporting requirements; and

- assist Morgan and/or its representatives with applicable on-site inspections or audits of suppliers' due diligence policies, procedures and systems related to conflict minerals.

The process of tracing conflict minerals through any supply chain is complicated and time-consuming. However, Morgan is committed to ethical business practices and compliance with all applicable laws and regulations and is also committed to working with our customers and our suppliers to ensure effective implementation of Conflict Minerals related regulations. Should we determine that a supplier is violating this guidance we will discontinue engagement with the upstream suppliers after failed attempts at mitigation.