



STATEMENT ON CONFLICT MINERALS

Adopted May 2024

Background: Certain provisions of the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (the "*Dodd-Frank Act*") were enacted to address the exploitation and trade of certain minerals which have contributed to violence and human rights abuses in the Democratic Republic of the Congo (the "*DRC*") and its neighboring countries. The SEC adopted rules in 2012 implementing the conflict minerals provisions of the Dodd-Frank Act (the "*Conflict Minerals Rules*"), which require public companies to disclose information annually about whether the products they manufacture contain Conflict Minerals that originated in any "*Covered Countries*." "*Conflict Minerals*" are defined as are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten), and this list may be expanded in the future. "*Covered Countries*" are defined as the DRC, the Republic of the Congo, the Central African Republic, South Sudan, Uganda, Rwanda, Burundi, Tanzania, Zambia and Angola.

Our Policy: We support efforts to further the humanitarian goal of ending violent conflict in the DRC and in surrounding countries, which we understand has been partially financed by the exploitation and trade of Conflict Minerals. We are committed to responsible sourcing of materials for our products, including the sourcing of Conflict Minerals, and we expect our suppliers to be likewise committed to responsible sourcing. We also support greater transparency with regard to the supply chain, in particular the sourcing of Conflict Minerals. Accordingly, we have adopted this Statement on Conflict Minerals, and we expect our suppliers to have, or adopt, a comparable policy and meet our expectations set forth below.

Our Commitment: We are committed to sourcing products from suppliers that share our values with regard to human rights, ethics, and social and environmental responsibility. Our supply chain is highly complex, and our manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. As a result, we expect that our suppliers will partner with us to (i) provide appropriate information and conduct necessary due diligence in order to facilitate our compliance with the Conflict Minerals Rules, and (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a responsible manner that results in products and materials that are DRC Conflict Free. "DRC Conflict Free" is defined as products that do not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the Covered Countries. We are committed to working with our suppliers to educate them about these issues and the steps that they can take to increase the transparency of the supply chain.

Our Expectations for Suppliers: We have the following expectations of our suppliers:

- Suppliers are expected to source Conflict Minerals only from sources that are identified as DRC Conflict Free;
- Suppliers should not supply us with materials that directly or indirectly finance or benefit armed groups in the Covered Countries;
- Suppliers should develop policies and procedures, reasonably designed to prevent materials that are not DRC Conflict Free from entering our supply chain and to provide transparency as to the source of any Conflict Minerals; and
- Suppliers are expected to take steps to identify the steps in the supply chain through which Conflict Minerals are introduced, and to undertake due diligence efforts necessary to identify the smelter, refiner and/or mine from which Conflict Minerals originate, including requiring direct or indirect suppliers to our suppliers to cooperate in diligence efforts and to provide information necessary to facilitate our compliance efforts on Conflict Minerals Rules.

In seeking to meet these expectations, our suppliers will be expected to:

- Implement and communicate policies consistent with this Statement on Conflict Minerals, and require that their direct and indirect suppliers do the same;
- Establish procedures that facilitate the traceability of Conflict Minerals within our supply chain and provide for the sourcing of DRC Conflict Free materials under all circumstances;
- Provide us with timely and accurate information, at our request, regarding the source of Conflict Minerals in our supply chain and the steps that have been undertaken to determine whether such materials are DRC Conflict Free, including whether the source has been verified by a recognized, independent third party; and use reasonable efforts to source Conflict Minerals from smelters and refiners that have been validated by a recognized, independent third party as DRC Conflict Free; and
- Advise us promptly of any determination that any materials in the supply chain are not DRC Conflict Free.

We evaluate our relationship with our suppliers on an ongoing basis, and we reserve the right to evaluate the extent to which a supplier has failed to reasonably comply with this Statement on Conflict Minerals. If we determine that a supplier's efforts are deficient, we reserve the right to evaluate the supplier relationship and to take any appropriate action, including terminating our relationship with the supplier.

Nothing in this Statement on Conflict Minerals is intended to in any way grant any additional rights or expectations to any of our suppliers, or in any way modify or otherwise limit our contractual or legal rights.

Additional Information: Our employees, suppliers and other interested parties may contact us regarding this Statement on Conflict Minerals at: Gregoire Maes, Chief Operations Officer, CompoSecure, Inc., 309 Pierce Street, Somerset, NJ 08873.