

COMPOSECURE SUPPLIER DIVERSITY POLICY

SCOPE

The Supplier Diversity Policy (this “Policy”) applies to CompoSecure and all its subsidiaries (collectively “Company” or “CompoSecure”). All employees acting on behalf of the Company are expected to adhere to this Policy.

Supplier Diversity means providing qualified and certified diverse (defined below) and small businesses with the maximum possible opportunity to participate in every segment of your business and in every possible purchasing opportunity.

Diverse businesses are both owned and managed by qualifying persons (defined below). These persons must own a minimum of 51% of the business and be responsible for directly managing or controlling at least 51% of the business. Businesses owners must be U.S. citizens or have official resident status.

PURPOSE

This Policy communicates acceptable business practices and illustrates the commitment, teamwork, integrity, and core diversity principles of CompoSecure. Through execution of this Policy, CompoSecure fosters an inclusive supply chain process that enables the opportunity for full participation of businesses owned by women, minorities, veterans, LGBTQIA+ and disabled individuals, as well as small businesses in the Company’s supply chain.

POLICY STATEMENT

The focus of Supply Chain is to provide a continuous supply of cost-effective, quality goods and services with an emphasis on safety, ethics, value, and the environment. CompoSecure only procures goods and services from qualified suppliers and contractors and is committed to using and developing companies owned by ethnic minorities, women, and veterans, as well as small businesses. CompoSecure is uncompromising in its commitment to sourcing from vendors who uphold the highest standards for human rights and dignified working conditions in their own operations and in those of their value chains. Suppliers shall abide by federal, state/provincial, and local community-level laws pertaining to labor conditions and worker’s rights.

CompoSecure is committed to fostering an inclusive supply chain process that enables the opportunity for full participation of businesses owned by traditionally underrepresented groups including, but not limited to, women, ethnic minorities, veterans, LGBTQIA+ and

disabled individuals, as well as small businesses. CompoSecure is committed to increasing transparency into our supply chain diversity and tracking capital spent with suppliers that are members of underrepresented groups. As part of a focused effort to reflect the communities where the Company resides and serves, enhance overall cost savings, and increase market share, CompoSecure encourages all suppliers to foster an inclusive process and embrace diversity throughout their business practices. This includes administering diversity, equity, and inclusion-specific training to staff at all locations, tracking diversity statistics within the organization, conducting high-to-low pay analyses, and providing avenues for diversity efforts and inclusive practices within the company.

The Company expects that suppliers will make all employment decisions based on job-related qualifications and without regard to race, ethnicity, gender, gender identity, disability, religion, sexual orientation, marital status, citizenship, age, or any other legally protected status in each of the countries in which they operate, in accordance with all applicable laws and regulations, as well as suppliers that develop an internal diversity, equity, and inclusion program that includes avenues to identify and measure progress and continually improve practices.

GOVERNANCE / IMPLEMENTATION

The Company reserves the right to modify this Policy at any time, for any reason, and without prior notice. The Company will make prudent efforts to notify relevant employees when a material change to this Policy has been made, but employees are responsible for their own up-to-date knowledge about Company policies and procedures. Failure to abide by these standards could result in disciplinary action, up to and including termination.

Employees must report any suspected violation of this Policy. Help is available from, or reports can be made to, a policy officer, your supervisor, or other resources set forth in the Code of Conduct. The Company will not tolerate any retaliation against anyone making a good faith report. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if that person turns out to be mistaken.

COMMITMENT TO MEASUREMENTS AND REPORTING

To ensure the success and assess the impact of our supplier diversity program, CompoSecure will be developing and requiring suppliers to report on key metrics on an annual basis. Collecting relevant data will ensure that CompoSecure is able to track progress towards internally defined targets and communicate this progress to internal and external stakeholder groups. We request that our suppliers provide the following information on an annual basis:

- Diversity metrics within your own organization as it relates to the entire workforce, leadership, ownership, and Board of Directors (if applicable). At a minimum, internal diversity metrics should be defined by gender and race/ethnicity.
- Your organization's total spend with diverse-owned Tier 1 suppliers. Reporting should include total monetary amount spent with diverse suppliers and what percentage of total supplier spend this monetary amount accounted for.

We encourage our suppliers to move beyond these basic requests and expand their reporting metrics to include additional elements such as:

- Reporting internal diversity metrics according to additional attributes such veterans, LGBTQIA+, disabled individuals, and small enterprises.
- Reporting engagement with certified diverse-owned suppliers
- Expanding spend reporting beyond Tier 1 and into Tier 2 suppliers.

DEFINITIONS / KEY TERMS

The Company recognizes these business types as small and diverse firms:

Small Business:

- Woman Owned Small Business (WOSB)
- Small Disadvantaged Business (SDB)
- Veteran Owned Small Business (VOSB)
- Service Disabled – Veteran Owned Small Business (SD-VOSB)
- Small Business Enterprise (SBE)
- 8(a) Firms
- Federal HUBZone Certified Firms
- Historically Underutilized Business (HUB)

Diverse Firms:

- Minority Business Enterprise (MBE)
 - African American
 - Hispanic American
 - Asian Indian American
 - Pacific Islander American
 - Native American
- Women Business Enterprise (WBE)
- Disadvantaged Business Enterprise (DBE)
- Veteran Business Enterprise (VBE)
- Service-Disabled Veteran Business Enterprise (SD-VBE)
- Lesbian, Gay, Bi-Sexual, Transgender Business Enterprise (LGBTBE)
- Disability Owned Business Enterprise (DOBE)
- National Minority Supplier Development council