

Responsible Minerals Sourcing Policy	Procedure PP-8.4	Rev. No. A
	Date January 23, 2026	Page No. Page 1 of 3
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Revision	Date	Description of Change	Resp.
Dash	12/5/25	Original Release	MS
A	1/23/26	Re-Write (clarification)	MS

This policy applies to the selection and retention of all Banner Metalcraft Inc (BMI) suppliers that provide materials that contain tin, tantalum, tungsten, gold and/or cobalt.

1.0 Policy Statement

Banner Metalcraft Inc. committed to responsible minerals sourcing and upholding human rights and environmental protection in supply chains. The goal is to prevent the direct or indirect financing of conflict or human rights abuses through mineral procurement practices. Adherence to the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas is essential

2.0 Scope

This policy applies to all minerals, with an initial focus on the 3TGs (Tin, Tantalum, Tungsten, and Gold) and Cobalt, particularly those sourced from Conflict-Affected and High-Risk Areas (CAHRAs).

BMI deplores violence and inhumane treatment in the Democratic Republic of the Congo (DRC), adjoining countries and other parts of the world. By adopting this Policy and collaborating with our customers and suppliers, especially through Responsible Minerals Initiative's (RMI), BMI is working with others to promote responsible business practices and foster peace and prosperity, which is consistent with BMI values.

3.0 Responsibilities

3.1 Purchasing Agents: select external providers (suppliers / or subcontractors) capable of meeting the requirements and determines and manages the risk when selecting and using suppliers (ref procedure QAP 8.1.1).

3.2 The Quality Manager controls the Banner Approved Supplier Log (QAL-8.4B).

Responsible Minerals Sourcing Policy	Procedure PP-8.4	Rev. No. A
	Date January 23, 2026	Page No. Page 2 of 3

4.0 Commitments

4.1 Human Rights: Human rights abuse in the supply chain, including forced labor, child labor, and other gross human rights violations, will not be tolerated.

4.2 Conflict Financing: Direct or indirect financing or benefiting armed groups in CAHRAs will not be permitted.

4.3 Bribery and Corruption: There is a zero-tolerance policy against bribery and corruption.

4.4 Environmental Protection: The aim is to minimize the environmental footprint and prevent environmental harm related to mineral extraction.

5.0 Procedure

BMI is committed to responsible sourcing of minerals, including 3TG and cobalt, using the OECD due diligence framework, so as not to support conflict or human rights abuses in the DRC region or other CAHRAs, while avoiding de facto embargoes. This position is consistent with BMI's Code of Ethics and BMI's respect for human rights in our own operations and our supply chains, as well as with the OECD Due Diligence Guidance.

We have a robust due diligence program implemented by the supply chain, in line with the OECD Due Diligence Guidance, including:

- Risk Assessment: Identifying and assessing risks associated with sourcing minerals from CAHRAs.
- Supply Chain Traceability: Suppliers are required to provide detailed information on the origin of minerals in their products, at least down to the smelter or refiner level. The use of industry-standard tools like the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT) is encouraged.

BMI suppliers are required to:

- 5.1 Have a Responsible Minerals Sourcing Policy and due diligence process in place that aligns with ours.
- 5.2 Provide accurate and complete information on mineral sources in their products.
- 5.3 Comply with the Responsible Business Alliance (RBA) Code of Conduct or equivalent standards.
- 5.4 Extend these requirements to their own suppliers.
- 5.5 Cooperate in audits and assessments of their supply chains.

Responsible Minerals Sourcing Policy	Procedure PP-8.4	Rev. No. A
	Date January 23, 2026	Page No. Page 3 of 3

6.0 Corrective Action management

If non-conformance with this policy is identified, engagement with the supplier will occur to develop and implement a corrective action plan in accordance with QAP-10.2.1 Control of Nonconforming Product and QAP-10.2.2 Corrective Action Procedure.

7.0 References

- QAP-8.4 Purchasing
- QAP-8.1.1 Risk Management
- QAP-10.2.1 Control of Nonconforming Product
- QAP-10.2.2 Corrective Action

- QP-04 Code of Ethics and Business Conduct Policy