

POLICY STATEMENT REGARDING
Conflict Minerals

Conflict Minerals are defined in 2010 United States legislation, Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502(e)(4) as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, or any other mineral or its derivatives determined to be financing conflict in the Democratic Republic of the Congo or an adjoining country. 3TG is defined as **Tantalum, Tin, Tungsten and Gold**.

1. Scope:

1.1 This policy applies to all BioSpectra facilities located in the United States and all raw materials sourced for the manufacture of BioSpectra products.

2. Responsibilities:

2.1 BioSpectra, Inc. does not knowingly source conflict materials that directly or indirectly finance armed groups in the Democratic Republic of the Congo or any adjoining countries. BioSpectra is committed to working directly with our suppliers to source raw materials responsibly and does not intentionally add or use any conflict minerals or 3TG in the BioSpectra manufacturing processes. Therefore, conflict minerals or 3TG are not expected to be present in any BioSpectra products.

3. Implementation with our Supply Chain:

3.1 To further support this initiative, BioSpectra expects its suppliers to:

1. Establish policies to source materials responsibly avoiding any conflict minerals or 3TG
2. Provide any information regarding conflict minerals or 3TG supplied to BioSpectra upon request
3. Adhere to any laws and regulations aligned with the Dodd-Frank Wall Street Reform and Consumer Protection Act, specifically Section 1502(e)(4)
4. Carry the same or similar process throughout their own supply chain

4. Reporting and Accountability:

4.1 Raw Material Supplier Qualification Questionnaire is distributed prior to any qualification of a new supplier. The Regulatory Department will evaluate the responses and will determine whether the supplier is considered a Low Risk, Medium Risk or High Risk.

4.2 Compliance with the Dodd-Frank Act regarding Conflict Minerals is addressed in the Supplier Code of Ethics (BSI-FRM-1229).

4.3 Addressed in the Supplier Code of Ethics; "Supplier shall also respond to any questionnaire on conflict minerals as required by BioSpectra".



5. Integration with Corporate Strategy:

5.1 The Conflict Minerals Policy is integrated into our broader corporate sustainability strategy. It aligns with our commitment to environmental responsibility, ethics, and responsible supply chain.

6. Leadership Commitment:

6.1 Our leadership team endorses this Conflict Minerals Policy and is committed to providing the necessary resources and support for its implementation throughout our supply chain. The leadership team works with the Sustainability Team to ensure policy implementation and success.

7. Policy Review:

7.1 This policy will be reviewed in the First Quarter of each new year by the Sustainability Review Board or as needed to ensure its effectiveness and relevance.

8. Policy Approval:

8.1 Authorized person name: Paul DiMarco, Senior Vice President of Commercial Operations

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