



Conflict Minerals Policy

1. Background. In 2010, Congress passed the Dodd-Frank Act (“**Act**”), which directs the Securities and Exchange Commission (“**SEC**”) to issue rules requiring public companies to disclose their use of “conflict minerals” if those minerals are “necessary to the functionality or production of a product” manufactured by those companies. Under the Act, those minerals include tantalum, tin, tungsten, or gold which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively (“**3TG**”). Congress enacted this section based on concerns that the exploitation and trade of conflict minerals by armed groups is helping to finance conflict in the Democratic Republic of Congo region (“**DRC Region**”) and is contributing to a humanitarian crisis.
2. Purpose. Although SEC Conflict Minerals Rule (“**Rule**”) is not technically applicable to the Tribar Technologies, Inc. (“Tribar”) because the company is not publicly traded, the Tribar supports the goal of the rule to ensure that 3TG supply chains do not help support regional conflicts.
3. Adoption of Policy. Guided by the SEC Conflict Minerals Rule, the Company has instituted this Conflict Minerals Policy (“**Policy**”).
4. Prohibition on Support of Armed Groups. Tribar will not knowingly provide any direct or indirect support to non-state armed groups or security forces in the DRC Region that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain.
5. Anti-Corruption and Bribery. Tribar has a comprehensive policy that prohibits its employees from engaging in corruption and bribery. Tribar requires parties in our supply chain to follow the same principles.
6. Due Diligence. Tribar will follow due diligence procedures relating to conflict minerals which are consistent with a nationally or internationally recognized due diligence framework which may include the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#).
7. Supplier Requirements. Where possible, Tribar will incorporate the principles of responsible sourcing of conflict minerals into its contract terms with suppliers and will work with its suppliers to create awareness of these issues within our supply base. Tribar will make its position statement available to its suppliers and expects them to adopt similar positions or policies with respect to their own supply chains.

8. Remedial Actions. If Tribar determines that a supplier in its supply chain has violated this Policy, Tribar will endeavor to obtain an acceptable remediation of the violation, including taking actions to help resolve supplier violations. These actions may include, but are not limited to, direct communications and compliance education and training. Tribar may also reassess its business relationship with a supplier if consistent improvement of identified violations is not achieved.
 9. Internal Reporting. Any employee, independent contractor, or agent of Tribar who has reason to believe a violation of this Policy may have occurred should report such information as soon as possible to either their immediate supervisor or the Compliance Director.
 10. Dissemination. Upon adoption or revision, a copy of this Policy will be disseminated to all Company employees, independent contractors, and agents.
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Regulatory references:

- SEC Conflict Mineral Final Rule, available at <https://www.sec.gov/files/rules/final/2012/34-67716.pdf>.
- Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, [15 U.S.C. § 78m](#).

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