



Conflict Minerals Policy

Purpose

Vybond Group, Inc. and its subsidiaries (“Vybond”) are committed to responsible sourcing and transparency in our supply chain. We aim to avoid contributing to armed conflict or human rights abuses through the procurement of minerals. This policy aligns with:

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals
- Section 1502 of the Dodd-Frank Act
- The Responsible Minerals Initiative (RMI) and its updated Extended Minerals Reporting Template (EMRT)
- Emerging global regulations, including the Uyghur Forced Labor Prevention Act (UFLPA)

Scope

This policy applies to all Vybond employees and suppliers. We expect suppliers to provide timely and accurate information about the origin of minerals and the smelters or refiners used, and to cooperate with our due diligence efforts.

Covered Minerals

Conflict Minerals include:

- Tin, Tungsten, Tantalum, and Gold (3TG)
- Cobalt, Mica, Copper, Lithium, Nickel, and Natural Graphite (as per 2025 EMRT updates)

Policy Commitments

Responsible Sourcing

Vybond seeks to source minerals that are DRC Conflict-Free, meaning they do not directly or indirectly finance armed groups in the Democratic Republic of Congo or adjoining countries.

Due Diligence Framework

We follow the OECD’s Five-Step Framework:

- Establish strong internal controls and supplier expectations
- Identify and assess risks in the supply chain
- Respond to identified risks
- Conduct independent audits when necessary
- Report annually on due diligence efforts

Reasonable Country of Origin Inquiry (RCOI)

We conduct RCOI to determine the origin of minerals and assess compliance beyond smelter-level data.



Supplier Expectations

Suppliers must:

- Complete conflict minerals surveys
- Use RMAP-conformant smelters and refiners
- Disclose beneficial ownership and sourcing practices
- Avoid sourcing from entities on international sanctions lists

Red Flags

Employees and suppliers should report concerns if they observe:

- Minerals sourced from or refined in Covered Countries
- Supplier refusal to complete surveys
- Use of recycled materials refined in high-risk regions
- Past sourcing from conflict-affected areas
- Links to sanctioned entities or smelters

Reporting and Accountability

- Concerns can be raised confidentially through the [Paycom Hotline 24/7](#).
- Reports may also be directed to Managers, HR, or Legal & Compliance (legal@vybond.com).
- Retaliation for good faith reporting is strictly prohibited
- Throughout investigations, Vybond will maintain confidentiality, to the extent possible, based on its legal and ethical responsibilities.

Version Control

Date	Version Number	Purpose/Change	Author/Approver
November 1, 2025	1.0	Original Version	Sr Legal & Compliance Manager