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CONFLICT MINERALS POLICY

April 23rd, 2026

1. Purpose

ACORDE is committed to responsible sourcing of minerals and to preventing the use of tin, tantalum, tungsten and gold (3TG) that may finance or benefit armed conflict or contribute to human rights abuses.

2. Scope

This policy applies to all products manufactured and supplied by ACORDE, as well as to its supply chain.

3. Regulatory Framework

ACORDE acknowledges and supports compliance with applicable regulations and standards, including:

- Section 1502 of the U.S. Dodd-Frank Act
- Regulation (EU) 2017/821
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

4. Company Position

ACORDE does not directly source or procure 3TG minerals. However, these materials may be present in components supplied by third parties.

5. Due Diligence Process

ACORDE implements due diligence measures aligned with OECD guidance, including:

- Identification of relevant suppliers
- Collection of conflict minerals data using the Conflict Minerals Reporting Template (CMRT) from the Responsible Minerals Initiative (RMI)
- Evaluation of supplier responses

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6. Supplier Requirements

ACORDE expects its suppliers to:

- Adopt responsible sourcing practices
- Exercise due diligence on the origin of 3TG
- Provide accurate and complete information using recognized industry tools such as CMRT
- Avoid sourcing from conflict-affected and high-risk areas where minerals directly or indirectly finance armed groups

7. Limitations

As a downstream company, ACORDE relies on information provided by its suppliers and does not have direct visibility over smelters or mines in all cases. Therefore, ACORDE cannot guarantee that all products are conflict-free.

8. Continuous Improvement

ACORDE is committed to continuously improving supply chain transparency and responsible sourcing practices.

ACORDE Space & Defence RF EXPERTS

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