

Responsible Sourcing Policy

At **Syntec Optics Inc.,** we are committed to conducting business ethically and responsibly throughout our supply chain. We recognize that the sourcing of certain minerals may contribute to human rights abuse, environmental harm, corruption, and armed conflict in some regions of the world. We are committed to supporting responsible mineral sourcing practices that respect human rights, protect the environment, and promote transparency.

Scope

This policy applies to all employees, suppliers, contractors, and business partners involved in the procurement of materials, components, and products supplied to or on behalf of Syntec Optics Inc.,.

Covered Minerals

This policy addresses the responsible sourcing of minerals that may present elevated social or environmental risks, including but not limited to:

- Tin
- Tantalum
- Tungsten
- Gold (commonly referred to as "3TG")

Our Commitments

Syntec Optics Inc, is committed to:

- Complying with all applicable laws and regulations regarding responsible mineral sourcing.
- Supporting internationally recognized standards for responsible supply chain due diligence, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Respecting internationally recognized human rights throughout our operations and supply chain.
- Avoiding knowingly sourcing minerals that directly or indirectly finance armed groups or contribute to serious human rights abuses.
- Promoting environmental stewardship and responsible mining practices among our suppliers.
- Encouraging transparency and traceability within our supply chain.

Supplier Expectations

We expect our suppliers to:

- Source minerals responsibly and ethically.
- Establish due diligence processes appropriate to their operations.
- Identify the smelters and refiners used within their supply chains where reasonably possible.
- Cooperate with requests for information regarding mineral sourcing.
- Promptly address identified risks and implement corrective actions where necessary.
- Flow these expectations down to their own suppliers.

Due Diligence

Syntec Optics Inc, seeks to implement a risk-based due diligence process that may include:

- Assessing supplier sourcing practices.
- Requesting responsible minerals reporting from suppliers.
- Reviewing supplier responses for completeness and identified risks.
- Engaging suppliers to improve responsible sourcing practices.
- Taking appropriate action if significant risks are identified and not adequately addressed.

Continuous Improvement

Responsible sourcing is an ongoing process. We are committed to continually improving our due diligence efforts, enhancing supply chain transparency, and working collaboratively with suppliers to strengthen responsible sourcing practices.

Reporting Concerns

Employees, suppliers, and other stakeholders are encouraged to report concerns regarding unethical sourcing practices, human rights violations, or other issues related to this policy through [Company Name]'s established reporting channels. Reports will be reviewed appropriately and handled in accordance with applicable laws and company policies.

Governance

This policy is reviewed periodically and updated as necessary to reflect changes in applicable laws, industry standards, and our business operations.

Questions regarding this policy may be directed to:

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