



CONFLICT MINERALS POLICY

Updated July 10, 2024

“Conflict Minerals” include tantalum, tin, tungsten, gold and certain magnets. Klas fully supports efforts to eliminate the use of Conflict Minerals from improper sources that could support human rights abuses in conflict-affected and high-risk areas (“CAHRAs”) anywhere in the world and has engaged in the process of obtaining information from its metal suppliers concerning the origin of the metals that are used to manufacture Klas products.

Klas, like many companies in the technology and electronic industries, uses such metals to manufacture electronic products. Each of these metals has specific electrical properties which are necessary for the function of our products.

In July 2010, the United States Congress passed the Dodd-Frank Financial Reform Bill. Section 1502 of this bill requires all U.S. publicly traded companies and their suppliers to disclose their use and sources of Conflict Minerals.

In January 2021, the EU Conflict Minerals Regulation came into force and EU importers will now need to comply with, and report on, supply chain due diligence obligations if the minerals originate (even potentially) from “CAHRAs”.

Klas does not directly source Conflict Minerals from mines or smelters. Therefore, it relies on the information provided by its suppliers regarding their sourcing of metals. Klas expects its suppliers to source materials from socially responsible suppliers and that all its suppliers will comply with the Dodd-Frank and EU Conflict Minerals Regulation requirements and provide all necessary declarations and supporting information. Suppliers must pass these requirements through to their supply chain if they do not source directly from mines or smelters and determine the source of the Conflict Minerals used in the component or product that Klas purchases.

Klas will assess future business with suppliers who are not cooperative with the conflict-free sourcing initiative and not compliant with this Policy. Klas will continue to regularly perform due diligence and survey its suppliers to verify compliance with this Policy. Klas is committed to ethical practices and compliance with applicable laws and regulations wherever it does business.

The following people and / or Departments are responsible for maintaining this Policy:

Legal Department – Final Approval of all Revisions

Version Control

Version Number	Author	Purpose/Change	Date Adopted
0.1	Aoife Murphy	Initial Draft and Adoption	14 July 2021
0.2	Aoife Murphy	General Review and insertion of version control	10 July 2024