

	Title		
	Conflict Minerals Policy		
Document ID: BIMS-1732921432-26	Owner: Aja Martinez	Approver: Aja Martinez	Next review: 01/08/2021

Bullitt Group, making innovative products and services that bring together global brands and connected device technologies, is committed to making informed decisions about sourcing minerals in its supply chain. The company adheres to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, and it requires the continuous maintenance of the same compliance level from its manufacturing suppliers.

The company is committed to that tantalum, tin, tungsten and gold (together 3TG or "Conflict Minerals") in its products does not directly or indirectly finance or benefit armed groups that are serious offenders of human rights in the Democratic Republic of the Congo or an adjoining country.

The company's expectations on its major suppliers (product manufacturing partners) are clearly communicated through this policy and the relevant provisions of all future manufacturing contracts:

- Cascade this policy down in the entire upstream supply chain
- Identify parts and processes using Conflict Minerals
- Use only conflict-free sources of 3TG minerals
- Promote the use of Smelters/Refiners audited by independent 3rd party auditors
- Identify and communicate a responsible contact person for Conflict Minerals
- Submit a completed CMRT report for every product to Bullitt Group annually
- Report any Conflict Mineral issues or raise a red flag for potential issues
- Innovate in technology and promote the collection and reuse of Conflict Minerals

The company will review the due diligence information provided in the CMRT reports to update and control its risk management practices.

In the event of incomplete or no responses to the CMRT data request after several attempts, the company reviews its relevant risk analysis which, if practicable and reasonable, may result in initiating a disengagement process with such non-cooperative suppliers.

The CPO is responsible for the adequacy and efficiency of this policy within the company.

Reviews and updates of this policy shall take place annually to reflect changes to legislation, and emerging good practices or business needs.

Copies of the company's Conflict Minerals Policy shall be made available to its customers, suppliers and other organisations with a direct interest.

Electronically signed by:

Aja Martinez (CPO)

Date: 08/25/2020