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Quality Approval *(Mandatory for Core Documents)*	N/A	N/A

Transferred as is from POL034 – SEA Supplier Conflict Minerals Policy for BMS 2.0 Project Migration. To be updated to at next review.

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1. PURPOSE AND APPLICATION

Systems Engineering and Assessment Ltd (SEA) is committed to conducting business ethically and in compliance with all applicable laws, regulations, and international standards. This Conflict Minerals Policy outlines the Company's commitment to ensuring that minerals used in the manufacturing of our products do not directly or indirectly finance armed conflict, human rights abuses, or environmental degradation in regions affected by conflict. This policy applies to all suppliers, manufacturers, and other third parties involved in our supply chain.

This policy applies to all suppliers and vendors of materials, components, and products supplied to SEA, and to all minerals used in the production of products we manufacture, including but not limited to:

Tantalum, Tin, Tungsten & Gold

(collectively known as the "Conflict Minerals")

This policy is aligned with the expectations set forth by the UK Modern Slavery Act, the EU Conflict Minerals Regulation (Regulation (EU) 2017/821), and international standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

2. POLICY STATEMENT

SEA is committed to ensuring that the conflict minerals used in the manufacture of our products are sourced responsibly and in compliance with international human rights standards. Specifically, we are committed to:

2.1. Avoiding the Use of Conflict Minerals

SEA strives to avoid sourcing conflict minerals from regions where their extraction and trade contribute to human rights abuses or fuel violent conflict, particularly in the Democratic Republic of Congo (DRC) and its adjoining countries.

2.2. Due Diligence in Supply Chain

We require our suppliers to undertake due diligence processes to identify the source of the minerals they use. Suppliers must demonstrate that they have taken steps to ensure that no conflict minerals from high-risk regions are used in the products supplied to SEA.

2.3. Supply Chain Transparency

We expect transparency and traceability from all suppliers, and we will take appropriate steps to engage with suppliers that do not meet our standards, including working with them to implement corrective actions or considering alternative sourcing options.

2.4. Risk Mitigation

If the use of conflict minerals from high-risk areas is identified, we will take steps to mitigate the risks, including working with suppliers to find alternative sources of materials,

implementing stricter controls in our supply chain, and ensuring that we do not indirectly contribute to financing conflict or human rights abuses.

3. Supplier Expectations

We require our suppliers to adhere to the following guidelines:

3.1. Conflict-Free Sourcing

Suppliers must provide evidence that the minerals in their products do not originate from sources that finance armed conflict or human rights abuses in conflict-affected areas.

3.2. Due Diligence Process

Suppliers must conduct supply chain due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or other globally recognized standards.

3.3. Reporting

Suppliers must provide necessary documentation upon request, including a completed Conflict Minerals Reporting Template (CMRT) or equivalent forms. Suppliers should work with the Company to disclose the source and chain of custody of any conflict minerals used in our products.

3.4. Corrective Action

If a supplier identifies conflict minerals in their supply chain, they must inform the Company immediately and work to implement corrective actions.

4. MONITORING, REVIEW AND EFFECTIVENESS

4.1. Audits and Assessments

The Company reserves the right to conduct audits and assessments of suppliers' practices to verify compliance with this policy. Suppliers may be required to provide access to records and information as part of these audits.

4.2. Non-Compliance

If a supplier fails to comply with this policy or demonstrates a lack of commitment to responsible sourcing of conflict minerals, SEA reserves the right to take corrective actions, including the termination of the business relationship

5. COMMITMENT TO CONTINUOUS IMPROVEMENT

SEA is committed to continuously improving its conflict minerals compliance processes and encouraging responsible practices throughout our supply chain. We will work collaboratively with our suppliers and stakeholders to enhance the effectiveness of our due diligence efforts and ensure compliance with this policy.

6. REPORTING CONCERNS

Employees, suppliers, and other stakeholders are encouraged to report any concerns regarding potential violations of this policy through our whistleblowing channels. Reports will be treated confidentially, and the Company will take appropriate actions to address any violations.

7. CONCLUSION

By adhering to this Conflict Minerals Policy, SEA aims to ensure that its operations and supply chain contribute to sustainable development, respect human rights, and avoid supporting conflict or human suffering. The Company is dedicated to working collaboratively with its suppliers, industry partners, and other stakeholders to achieve responsible sourcing and mitigate the risks associated with conflict minerals.

8. DOCUMENT CONTROL

Version Number	Issue Date	Summary of Changes
1	01 SEP 2026	First Issue with new BMS2.0 taxonomy, no altered content only transfer of wording to new template. Legacy doc number = *POL034*