

CONFLICT MINERAL POLICY

Malamet Sdn Bhd supports ending the violence and human rights violations related to the mining of certain minerals from a locations described as the “Conflict Region,” which is situated in the eastern PART of the Democratic Republic of Congo (DRC) and surrounding countries.

Malamet is committed to sourcing components and materials from companies that share its values around human rights, ethics and environmental responsibility. We expect all our suppliers abide by the requirements of our Supplier Code of Conduct, which prohibits human rights abuses and unethical practices. We also require all suppliers to comply with applicable legal standards and requirements.

As a result of the violence and violations, the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 directed the U.S. Securities and Exchange Commission (SEC) to adopt rules to implement disclosure requirements related to these “conflict minerals”.

“Conflict minerals,” as defined by the US legislation, currently include the metals tantalum, tin, tungsten and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively. Downstream companies often refer to the extracts of these minerals as 3TG.

We committed to support the aims and objectives of the SEC rules and regulations related to the supply of conflict minerals.

We ensure that any tin, tantalum and tungsten that we procure and originated from the Conflict Region has been certified as “conflict free” via acknowledgment of ITRI Tin Supply Chain Initiative (ITSCI) due diligence program.

We will participate in initiatives to ensure that trade of these minerals from Conflict Affected Areas (CAHRA) countries will be carried out in compliance with the requirements of the international community. Also, we will suspend or terminate business relationships with suppliers who supply materials from mines that come under the Annex II risk and who do not address known risks.

We are also committed to align with the Organisation for Economic Co-operation and Development (OECD) and the United Nations (UN) guidelines for company due diligence on minerals from CAHRA countries by developing and implementing due diligence management system and audit.

We will ensure that we meets the requirement of the Governments of the affected countries and explore opportunities for establishing, either unilaterally and/or on a joint venture basis with private companies as well as Governments in industrial size mining projects in CAHRA countries.

Malamet will assist its customers in implementing their conflict minerals programs. We strive to work cooperatively with our customers and supply chain partners in implementing conflict minerals compliance programs. Malamet requires all of its suppliers to provide with completed conflict minerals declarations using the RMI Conflict Minerals Reporting Template. We may reconsider our willingness to partner with suppliers that fail to comply with this Policy.