

Omni Engineering, Inc.

Responsible Mineral Sourcing Policy

Omni Engineering, Inc. is committed to **responsible mineral sourcing** and to conducting business in a manner that supports ethical, transparent, and responsible supply chains. We recognize our responsibility to understand the sources of minerals contained in the products and metals we purchase and to take appropriate measures to address the risks associated with mineral sourcing.

Omni Engineering, Inc. expects its metal suppliers and plating vendors to support these principles and to exercise appropriate due diligence regarding the origin and supply chain of minerals incorporated into metals and plating services purchased by Omni Engineering, Inc.

Policy Requirements

Omni Engineering, Inc. expects applicable suppliers and vendors to:

1. **Support responsible mineral sourcing** by sourcing minerals and mineral-containing materials through responsible and transparent supply chains.
2. **Comply with applicable laws and regulations** relating to conflict minerals and responsible mineral sourcing, including applicable requirements of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act, U.S. Securities and Exchange Commission requirements, and other applicable national, state, or local laws and regulations.
3. **Conduct appropriate supply-chain due diligence** to determine, to the extent reasonably possible, the source and chain of custody of applicable minerals contained in metals supplied or plating purchased by Omni Engineering, Inc.
4. **Address risks associated with mineral sourcing**, including the potential contribution of mineral sourcing to conflict, human rights abuses, forced labor, child labor, corruption, money laundering, or other serious social and environmental risks.
5. **Provide accurate and complete information** regarding mineral content, country of origin, smelters, refiners, and relevant supply-chain information when requested by Omni Engineering, Inc. or its customers.
6. **Complete and provide appropriate industry-standard reporting templates**, including the Responsible Minerals Initiative (RMI) Conflict Minerals Reporting Template (CMRT) and, when applicable, the Extended Minerals Reporting Template (EMRT) and Additional Minerals Reporting Template (AMRT), or successor reporting tools recognized as appropriate for responsible mineral sourcing.
7. **Maintain adequate records and supporting documentation** demonstrating the basis for responses provided in mineral sourcing declarations and surveys and make such information available when reasonably requested for due diligence, customer requirements, or compliance verification.
8. **Work cooperatively with Omni Engineering, Inc.** when additional information, clarification, documentation, or corrective action is required to evaluate responsible mineral sourcing risks within the supply chain.
9. **Take appropriate corrective action** when identified sourcing practices or supply-chain information indicate a potential violation of applicable requirements or an unacceptable responsible sourcing risk. Suppliers are expected to cooperate in developing and implementing reasonable corrective actions within an appropriate timeframe.
10. **Promote continuous improvement** in responsible mineral sourcing practices and transparency throughout the supply chain.

Omni Engineering, Inc.

Omni Engineering, Inc. Commitment

Omni Engineering, Inc. will incorporate responsible mineral sourcing considerations into its supplier and supply-chain due diligence activities, as applicable to the metals and plating services it purchases. The Quality Department is responsible for administering the company's responsible mineral sourcing program and coordinating applicable supplier information requests, evaluations, records, and reporting activities. The Quality Manager has responsibility for approving compliance decisions and determining appropriate actions when potential sourcing risks or nonconformities are identified.

Omni Engineering, Inc. will use reasonable, risk-based measures to evaluate information received from suppliers and will work with suppliers and customers to improve supply-chain transparency and address identified risks.

Omni Engineering, Inc. does not knowingly support or condone the use of minerals sourced in a manner that contributes to armed conflict, serious human rights abuses, forced labor, child labor, corruption, or other significant responsible-sourcing risks.

This policy applies to Omni Engineering, Inc.'s applicable suppliers and vendors, and is intended to support compliance, transparency, ethical business practices, and the continual improvement of **responsible mineral sourcing** throughout the supply chain.

Policy Owner: Tracy Moss, Quality Manager (tracy@omni-eng.com)

Approval Authority: Tracy Moss, Quality Manager (tracy@omni-eng.com)

Review Frequency: At least annually and whenever applicable regulatory, customer, or responsible-sourcing requirements materially change.