

Responsible Minerals Sourcing Policy

Purpose:

D. J. Grey Company, Inc. is committed to ethical business practices and social responsibility. While our company is not directly subject to the reporting requirements of the Dodd-Frank Act, we are committed to supporting the supply chain in the reporting process. As a contract manufacturer specializing in electro-mechanical assemblies, we strive to ensure that the components we procure align with responsible sourcing principles.

Scope:

This policy applies to all suppliers and subcontractors providing components, materials, and subassemblies to DJ Grey Company. We expect our suppliers to share our commitment to responsible mineral sourcing and ethical supply chain management.

Commitment to Responsible Sourcing:

DJ Grey Company supports efforts to source minerals responsibly, particularly those identified as conflict minerals (tin, tungsten, tantalum, and gold, or "3TG") under the Dodd-Frank Act. While we do not source these minerals directly, we expect our suppliers to:

- Conduct due diligence to determine the origin of minerals in their supply chain, in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Comply with applicable laws and regulations regarding conflict minerals sourcing.
- Source minerals from smelters and refiners that are certified as conflict-free by recognized industry programs, such as the Responsible Minerals Initiative (RMI).

Supplier Expectations:

Suppliers providing components to DJ Grey Company are expected to:

- Implement and maintain policies for responsible mineral sourcing.
- Provide conflict minerals declarations or certifications upon request.
- Notify DJ Grey Company if any supplied products contain 3TG minerals sourced from conflict-affected regions.
- Work toward improving transparency and accountability in their supply chains.
- Conduct periodic assessments or audits to verify compliance with responsible sourcing requirements.
- Publicly disclose their mineral sourcing policies and practices, where applicable.

Continuous Improvement:

DJ Grey Company will continue to engage with suppliers, industry partners, and stakeholders to promote responsible sourcing practices. We encourage suppliers to adopt best practices in mineral due diligence and remain informed on evolving regulatory requirements.

Reporting Concerns:

If any supplier or stakeholder has concerns about the sourcing of minerals in our supply chain, they are encouraged to report them to DJ Grey Company's management for review and appropriate action.

By implementing this policy, DJ Grey Company reaffirms its commitment to ethical supply chain practices and corporate responsibility.