



Conflict Minerals Policy Statement

Delfield is committed to sourcing components and materials from companies that share our values around human rights, ethics and environmental responsibility. We expect all of our suppliers to 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.

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule"). The Conflict Minerals Rule requires publicly traded companies to report annually the presence of conflict minerals (tin, tungsten, tantalum and gold, or "3TG") originating in the Democratic Republic of the Congo or adjoining countries ("Covered Countries").

Delfield supports the goal of ending violence, human rights violations and environmental devastation in the Covered Countries. We have developed our policy to align with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We are committed to complying with any requirements applicable to our Company under the Conflict Minerals Rule and will work to understand and trace the 3TG minerals that are contained within the products coming from the supply chain. As part of our due diligence efforts, Delfield relies on internationally-recognized validation schemes that facilitate independent third-party audits of smelters or refiners and validate that smelters or refiners have met the requirements of the OECD Guidance, such as the Responsible Minerals Initiative (RMI) Conflict-Free Smelter Program.

Delfield strive to work cooperatively with our customers and supply chain partners in implementing conflict minerals compliance programs.

Delfield requires all of our suppliers to provide us 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.

Signature: 

Name: Paul Myerscough

Date: 05/02/2024

Title: Chairman