

## **Conflict Minerals Policy Statement September 2025**

In recognition of global concerns regarding the link between conflict minerals and armed conflict in the Democratic Republic of Congo (DRC) and adjoining countries, Medical Device Components LLC dba Lighteum Medical ("Lighteum Medical") is committed to responsible sourcing practices and ethical supply chain management.

Lighteum Medical monitors its supply chain to determine and disclose the origin of any "conflict minerals" necessary to the functionality or production of its products. These conflict minerals typically include tantalum, tin, tungsten, and gold (collectively referred to as "3TGs").

It is the policy of Lighteum Medical to not knowingly procure any 3TG minerals that directly or indirectly finance armed groups in the DRC region. All products manufactured or sold by Lighteum Medical must be determined to be "DRC Conflict Free." If any product is found not to meet this standard, the company will take immediate corrective action to transition the product to conflict-free status.

## **Lighteum Medical Commits To:**

- 1. Supply DRC Conflict Free Materials: Provide only materials that are DRC Conflict Free—either (a) materials that do not contain any conflict minerals that finance or benefit armed groups in the DRC region, or (b) materials that include only recycled or scrap sources of 3TGs.
- Maintain and Provide Documentation: Upon reasonable request, Lighteum Medical will provide chain-of-custody documentation and origin reports for any 3TGs included in materials supplied or used in the production of company products and cooperate with any required due diligence or audit.
- 3. Report Sourcing Difficulties: Promptly disclose any challenges or uncertainties in determining the origin of 3TGs and cooperate in good faith to resolve them. Implement Responsible Sourcing Systems: Establish and maintain policies and management systems that address conflict mineral sourcing and require the same from your own suppliers.

## **Definition of Recycled or Scrap Sources:**

Conflict minerals are considered "recycled or scrap" if derived from reclaimed end-user or postconsumer products, or scrap processed metals generated during

manufacturing. This includes obsolete, defective, or excess materials suitable for recycling into tin, tantalum, tungsten, and/or gold. Minerals that are partially processed, unprocessed, or by-products from another process are not considered recycled.

Lighteum Medical is committed to working with suppliers who share our values of ethical business conduct, transparency, and human rights protection.