

Latch, Inc. Conflict Minerals Policy

The Dodd-Frank Wall Street Reform and Consumer Protection Act (the "**Dodd-Frank Act**") contains conflict minerals provisions that address the exploitation and trade of certain minerals that contribute to violence and human rights abuses in the Democratic Republic of Congo and its neighboring countries. Under rules adopted by the Securities and Exchange Commission implementing these conflict minerals provisions (the "**Conflict Minerals Rules**"), public reporting companies such as Latch, Inc. ("**Latch**") with "Conflict Minerals" that are necessary to the functionality or production of a product manufactured or contracted to be manufactured by that company must make certain annual disclosures regarding such Conflict Minerals. The "**Conflict Minerals**" for purposes of the Conflict Minerals Rules are gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin, and tungsten) and any other minerals designated by the U.S. Secretary of State in the future. The "**Covered Countries**" are the Democratic Republic of Congo, Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. "**DRC Conflict Free**" means that a product does not contain Conflict Minerals that directly or indirectly finance or benefit armed groups in the Covered Countries.

Policy Statement

Latch supports efforts to end the human suffering and environmental impact of mining in the Covered Countries. We are committed to meeting all legislative and regulatory requirements that seek to eradicate this suffering. We also support transparency concerning our supply chain, particularly the sourcing of Conflict Minerals. Accordingly, we have adopted this Conflict Minerals Policy and have the below expectations of our suppliers.

Our Expectations for Suppliers

Tracing the origin and chain of custody of minerals throughout a global supply chain is a complex process. This can only be accomplished with the cooperation and support of public and private stakeholders across multiple industries. To this end, we have the following expectations of our suppliers and their suppliers to acquire minerals only from responsible sources:

- Suppliers should not supply us with products or other materials that directly or indirectly finance or benefit armed groups in the Covered Countries.
- Suppliers should use their best efforts to source Conflict Minerals only from sources identified as DRC Conflict Free.
- Suppliers should develop policies, procedures, due diligence processes, and management systems that are reasonably designed to prevent products or minerals that are not DRC Conflict Free from entering our supply chain and to provide transparency as to the source of any Conflict Minerals.
- Suppliers are expected to take appropriate actions to identify the steps in the supply chain through which Conflict Minerals are introduced and to undertake all due diligence

efforts necessary to identify the smelter, refiner, and/or mine from which Conflict Minerals originate, including requiring their direct or indirect suppliers to cooperate in diligence efforts and to provide any information necessary to facilitate our compliance with the Conflict Minerals Rules.

- Suppliers are encouraged to support industry efforts to enhance the traceability and responsible sourcing of Conflict Minerals.

In seeking to meet these expectations, our suppliers will be further expected to:

- Implement and communicate policies consistent with this Conflict Minerals Policy and require that their direct and indirect suppliers do the same.
- Establish procedures and contractual provisions that facilitate the traceability of Conflict Minerals within our supply chain.
- Provide us with timely and accurate information, at our request, regarding the source of Conflict Minerals in our supply chain and the steps that have been undertaken to determine whether such products and materials directly or indirectly finance or benefit armed groups in the Covered Countries, including whether a recognized, independent third party has verified the source.
- Use reasonable efforts to source Conflict Minerals from smelters and refiners validated by a recognized, independent third party as DRC Conflict Free.
- Advise us as promptly as possible of any determination that any products or materials in the supply chain are not DRC Conflict Free.

We evaluate our relationship with our suppliers on an ongoing basis. We reserve the right to assess the extent to which a supplier failed to comply with this Conflict Minerals Policy. If Latch determines that a supplier's efforts are deficient, we reserve the right to evaluate the supplier relationship and take appropriate action, including terminating our relationship.

Nothing in this Conflict Minerals Policy is intended to grant any additional rights or expectations to any of our suppliers or in any way modify or otherwise limit Latch's contractual or legal rights.

Inquiries or Concerns

Our employees, suppliers, customers, and other parties can make inquiries or report concerns and alleged violations related to this Conflict Minerals Policy by emailing us at conflictminerals@latch.com or anonymously through Latch's whistleblower hotline at <https://report.syntrio.com/latch> or toll-free at 833-759-7300.

Adopted December 20, 2023