



# Sustainable Procurement Policy

Struktol Company of America, LLC

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Our goal is to research and realize progressive ways to reduce our impact on the environment; be it our people or the planet. We strive to act as responsible global citizens by pursuing innovation with a purpose; developing our products in ways that protect the environment, drive responsible growth and strengthen our communities.

## 1. Scope

Our commitment is to deliver sustainable outcomes through our procurement activity and will be applied where relevant to the goods, services or outsourced manufacturing is being provided. Suppliers and Tollers alike will be required to comply with our Supplier Code of Conduct and Terms and Conditions.

## 2. Responsibility

Responsibility for adhering to this policy lies with site leadership. The implementation of this policy is in the collective responsibility of all purchasing employees, suppliers and Tollers.

### 2.1. Objectives

- Minimize emissions by sourcing locally and contributing to local economic growth
- Utilize suppliers that hold certifications and/or are focused on the health and safety of their employees and environment.
- Source office supplies manufactured with recycled materials
- Engage with suppliers that offer recycling waste services
- Exercise practices that focus on ethics and integrity, reflecting a high level of fairness and honesty while prioritizing principles over profit.

### 2.2. Monitor and Review

Our team is proud to have a Quality Management System that has ISO 9001:2015 with Design Certification. We pride ourselves on following our Standard Operating Procedures and working on strides to improve that align with our objectives. Our procurement team attends trainings focused on logistics and the social/environmental impacts it has to procuring our goods; follows internal processes that reduce risk to overall company performance, and performs quarterly monitoring metrics of our Supplier Compliance Rate.

### 2.3. Responsible Minerals Sourcing

We take seriously our responsibility to monitor our activities in the global market. Prior to making a supply chain decision, the origin of all raw materials is reviewed in detail. A conflict mineral survey is sent to relevant suppliers, and is reviewed against company expectations. The acquisition or purchase of minerals from conflict regions such as Democratic Republic of Congo, its neighboring countries, or other unstable regions is not permitted. Furthermore, we can confirm that Struktol Company of America products contain no intentionally added ingredients from the following conflict minerals: coltan, cassiterite, wolframite, tantalum, tungsten, gold or their derivatives. A sustainably sourced tin catalyst is used in the production of some Struktol products.

This policy will be communicated to all internal employees, directly and indirectly associated with procurement. External suppliers and stakeholders can view this policy by visiting our website [www.struktol.com](http://www.struktol.com) . It will be reviewed on a periodic basis to evaluate objectives, ensure compliance and drive continued improvement.

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