


Document #: CQP002	Title: CONFLICT MINERALS POLICY	Revision #: 000
 New Hampshire Ball Bearings, Inc. <b>MinebeaMitsumi Group</b> Astro, HiTech & Precision Divisions	Written/Approved By: T. Stokes (06/16/25)	Release Date: 08/21/25
	Approved By: P. O'Brien, R. Hancock, V. Hall, B. Anderson, W. Cobb, G. Hagenbuch, A. Villa, L. Janus ( <i>Approvals on File</i> )	Page 1 of 2
<b>CORPORATE QUALITY PROCEDURE</b>		

### 1. PURPOSE

To outline New Hampshire Ball Bearings, Inc. (NHBB) expectations and requirements for conflict minerals compliance throughout its supply chain.

### 2. SCOPE

2.1. Section 1502 of the Dodd-Frank Act (Dodd-Frank Wall Street Reform and Consumer Protection Act, passed by U.S. Congress in 2010) requires publicly traded companies to disclose the use of conflict minerals such as tin, tantalum, tungsten, and gold (“conflict minerals”) contained in the products they manufacture or contract to manufacture, where any conflict minerals are considered “necessary to the functionality or production” of those products. NHBB does not file reports with the U.S. SEC and has no legislative obligation to comply with the conflict minerals requirements of the Dodd-Frank Act. However, NHBB is committed to ensuring that the conflict minerals used in its products, parts or materials are not sourced from the Democratic Republic of the Congo (DRC) or adjoining countries.

2.2. NHBB acknowledges the importance of the issue and engages in ongoing and close dialogue with its suppliers about transparency of conflict minerals contained in the products, parts or materials sold to NHBB. NHBB has the following expectations of its suppliers:

- NHBB expects its suppliers to promptly, completely and accurately deliver the Conflict Minerals Reporting Template (CMRT) when requested.
- NHBB expects its suppliers to survey their upstream suppliers regarding conflict minerals, and verify and document such information.
- NHBB expects its suppliers to cooperate in the event that any further inquiry or due diligence is required with respect to the supply of conflict minerals.

2.3. NHBB believes in establishing and maintaining long-lasting relationships with suppliers whenever possible. Therefore, engaging with its suppliers to emphasize the importance of responsible sourcing is imperative. NHBB aims to continuously evaluate its relationships with its suppliers to ensure compliance with this policy.

### 3. RESPONSIBILITY

The Compliance Administrator is responsible for maintaining this specification.

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## 4. REVISION HISTORY

<b>Rev</b>	<b>Date</b>	<b>Description of changes</b>	<b>Prepared by</b>
000	08/21/25	Initial Release	T. Stokes

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