



Conflict Minerals Policy

Department:	All	Type:	Policy
Applies To:	Global	Last Reviewed:	01/05/2024
Administrator:	Group Legal & Compliance	Last Approved:	September 2024
Approver:	Offer Lehmann	Effective As:	September 2024

PURPOSE

In 2010, the U.S. Congress enacted the conflict minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") to address the exploitation and trade of certain minerals which contribute to violence and human rights abuses in the Democratic Republic of the Congo (the "DRC") and its neighboring countries. In 2012, the SEC adopted rules implementing the conflict minerals provisions of the Dodd-Frank Act (the "Conflict Minerals Rules"), which require public companies to disclose annually, information about whether the products they manufacture or contract to manufacture for which Conflict Minerals (as hereinafter defined) are necessary to the functionality or production of those products, contain Conflict Minerals that originated in the DRC or its neighboring countries, and, if so, information about the source and chain of custody of those Conflict Minerals.

Powerfleet acknowledges the critical importance of ethical sourcing practices in the supply chain, particularly regarding Conflict Minerals originating from the DRC and neighboring countries. Our commitment underpins efforts to mitigate the risk of contributing to human rights abuses and armed conflict in these regions. Beyond regulatory compliance, we aim to foster transparency, accountability, and sustainability throughout our supply chain.

SCOPE

Powerfleet is committed to sourcing products from suppliers that share its values regarding human rights, ethics, and social and environmental responsibility.

Powerfleet expects that all of its suppliers to partner with the Company to:

- (i) provide appropriate information and conduct necessary due diligence in order to facilitate its compliance with the Conflict Minerals Rules, and



- (ii) adopt appropriate sourcing practices so that Conflict Minerals are sourced only in a manner that results in products and materials that are DRC Conflict Free.

DEFINITION(S)

"Conflict Minerals" are defined as tin, tantalum, tungsten and gold.

"DRC Conflict Free" means that the product does not contain Conflict Minerals that directly or indirectly financed or benefitted armed groups in the DRC and neighboring countries.

"Powerfleet" or **"The Company"** shall mean Powerfleet and its subsidiary companies.

"Supplier(s)" shall mean a person, company, or organization that sells to or supply Powerfleet with goods and/or services.

POLICY

Although Powerfleet does not directly purchase any Conflict Minerals; Powerfleet purchases component parts from its suppliers that contain metals, which could be derived from mines in the DRC or its neighboring countries.

Powerfleet supply chain is highly complex, and the manufacturing process is significantly removed from the mining, smelting and refining of Conflict Minerals. Powerfleet is committed to working with its suppliers to educate them about these issues and the steps that can be taken to increase the transparency of the supply chain and to ensure that products and materials in the supply chain are DRC Conflict Free.

Suppliers who supply or manufacture components, parts or products containing conflict minerals are expected to source those minerals from socially and environmentally responsible sources that do not directly or indirectly contribute to conflict. Without limiting the foregoing, suppliers are expected to directly and indirectly source conflict minerals only from sources that do not directly or indirectly benefit or finance "armed groups" (as that term is defined in the Conflict Minerals Rule) in the DRC or another covered country.

In addition to this policy:

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- Suppliers should not supply Powerfleet with any products or other materials that directly or indirectly finance or benefit armed groups in the DRC and its neighboring countries;
- Suppliers are expected to source Conflict Minerals only from sources that are DRC Conflict Free;
- Suppliers should develop and adopt policies, procedures, due diligence processes and management systems that are reasonably designed to prevent products or materials that are not DRC Conflict Free from entering the supply chain and to provide transparency as to the source of any Conflict Minerals;
- Suppliers are expected to take steps to identify the elements 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 direct or indirect suppliers to Powerfleet suppliers to cooperate in due diligence efforts and to provide any information necessary to facilitate compliance efforts with respect to the Conflict Minerals Rules;
- Suppliers are encouraged to support industry efforts to enhance the traceability and responsible sourcing of Conflict Minerals; and
- Suppliers are expected to cooperate with Powerfleet in its efforts to comply with the applicable reporting requirements of governmental agencies (including without limitation the SEC Conflict Minerals Disclosure Rule).

Relationships with suppliers are evaluated on an ongoing basis, and Powerfleet reserves the right to assess the extent to which a supplier has failed to reasonably comply with this Conflict Minerals Policy. If it is determined that a supplier's efforts are deficient, Powerfleet reserves the right to evaluate the supplier relationship and to take any appropriate action, including terminating the relationship with the supplier.

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

COMPLIANCE

All PowerFleet employees and subsidiaries must comply with this Policy. Failure to comply may result in disciplinary action, including termination. Any person aware of non-compliance must report the violation in line with the Whistleblowing Policy.

AUDIT



This Policy is subject to periodic reviews and updates. Reviews and updates to the Policy are subject to review and approval by the corresponding Administrator and Approver. The Policy's effectiveness and compliance are audited annually or as deemed necessary by leadership.

REFERENCES

n/a

REVISION HISTORY

Review Date	Reviewer(s)	Review Notes
16 July 2024	Yaron Diner	n/a

APPROVAL HISTORY

Approval Dates	Approver(s)	Approval Notes
11 September 2024	Offer Lehmann	Approved