




SUBJECT: CONFLICT MINERALS
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VERSION: 2
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Brad Williams, President

CONFLICT MINERALS POLICY

1. INTRODUCTION

It is the policy of Cadre Holdings, Inc., on behalf of itself and its subsidiaries, (collectively, the "Company" or "Cadre"), to comply fully with all applicable laws and regulations governing its operations and to conduct business in an ethical and transparent manner. As a company which utilizes materials that originate from mining operations, Cadre ensures that our raw materials are ethically sourced by our supply chain.

The U.S Securities and Exchange Commission ("SEC") implemented reporting and disclosure requirements related to Conflict Materials set out in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2012. These requirements obligate manufacturers to file certain reports with the SEC to disclose whether the products they manufacture, or contract to manufacture, contain Conflict Minerals that are "necessary to the functionality or production" of those products.

2. DEFINITIONS

Conflict Minerals - Raw materials or minerals (gold, tin, tantalum and tungsten, the derivatives of cassiterite, columbite-tantalite and wolframite) mined in Democratic Republic of Congo (DRC), regardless of where they are sourced, processed or sold which provide revenue to corrupt and abusive armed groups, leading to brutal conflict in the DRC.

Conflict Region - Conflict Minerals mined in the DRC may pass through numerous locations in neighboring countries as they are shipped to processing facilities. These countries are Sudan, Central Africa Republic, Uganda, Congo Republic, Angola, Tanzania, Rwanda, Burundi, Democratic Republic of Congo, Zambia, and Angola.

3. PURPOSE AND SCOPE

The Company is committed to devising, implementing, and enforcing controls to ensure Conflict Minerals are not sourced by our supply chain and used in our products. The purpose of this Policy is to ensure that the Company and our supply chain procure only conflict free materials and components. Conducting due diligence requiring suppliers to prove the origin of raw materials ensures that our end products do not contain Conflict Minerals originating in the Conflict Region.

4. APPLICABILITY

Cadre and its supply chain shall comply with this Policy. Further guidance is available by contacting the Legal & Compliance Department.

5. POLICY

- a) Cadre supports the objectives of Section 1502 of the Dodd Frank Act on the supply of Conflict Minerals to break the links between the DRC minerals trade and abusive armed groups.

- b) Cadre will not knowingly procure materials that originate from facilities in the Conflict Region that are not certified as conflict free.
- c) The Company will ensure compliance by requiring that our suppliers undertake reasonable due diligence within their supply chains to assure that specified metals are being sourced only from:
 - Mines and smelters outside the Conflict Region, or
 - Mines and smelters which have been certified by an independent third party as conflict free if sourced within the Conflict Region.

6. REQUIREMENTS

Due diligence includes obtaining written evidence from our suppliers documenting that the raw materials (gold, tin, tantalum, and tungsten) used to manufacture components and products supplied to Cadre originate from outside the Conflict Region, or if they originate from within the Conflict Region, that the mines or smelters are certified as conflict free by an independent third party.

If Cadre discovers the use of Conflict Minerals in any material, parts, or components we procure, the Company will take appropriate actions to convert the product to be conflict free.

7. RESPONSIBILITIES

- a) Cadre's Supply Chain management and the Legal & Compliance department shall be responsible for developing, implementing, maintaining, overseeing, and auditing the protocols and procedures set forth in this Policy.
- b) Each manager, officer, and associate of the Company is individually responsible, by action and supervision as well as continuous review, to ensure strict compliance with this Policy.
- c) The Vice President, Legal is responsible for furnishing advice with respect to the interpretation and application of this Policy.
- d) Each associate has the affirmative obligation to promptly report in good faith any suspected violations of this Policy. Such reports shall be made to the associate's manager, the Ethics Helpline, Vice-President, Legal, or other appropriate reporting channels.
- e) Any confirmed violations of this Policy shall be reported to the Vice-President, Legal.

8. EXCEPTIONS

Any exceptions to, or deviations from, this policy require the prior written approval from the President or Vice President, Legal.

9. POLICY HISTORY

Version	Date	Description	Approved By
1.0	1/31/2022	Initial policy release	Brad Williams
2.0	5/1/2024	Update to Cadre Holdings	Julio Salvador