

Conflict Minerals Policy (the “Policy”)



Version	Owner	Last reviewed	Frequency of review	Updates
V1	CFO	Jan 2026	annual	Reviewed and approved by Group ExCo

1. Purpose

This Policy sets out Alaris The RF Technology Group Ltd’s (the “Company’s”) commitment to responsible sourcing of minerals and to ensuring that our supply chain does not contribute to armed conflict, human rights abuses, or environmental harm.

2. Scope

This policy applies to all employees, suppliers, contractors, and subsidiaries of the Company.

3. Definition of Conflict Minerals

Conflict minerals are tin, tungsten, tantalum, and gold (“3TG”), and any other minerals designated by applicable law, particularly those sourced from conflict-affected or high-risk areas.

4. Commitment to Responsible Sourcing

- The Company is committed to sourcing minerals responsibly and in accordance with the OECD Due Diligence Guidance, the EU Conflict Minerals Regulation, and the US Dodd-Frank Act (Section 1502).
- We will not knowingly procure materials containing conflict minerals that directly or indirectly finance or benefit armed groups in conflict-affected regions.

5. Supplier Requirements

- Suppliers must conduct due diligence on the source and chain of custody of conflict minerals in their products supplied to the Company and its subsidiaries (together “Alaris”).
- Suppliers are required to use only smelters and refiners that have been validated as conflict-free by credible third-party programmes (e.g., Responsible Minerals Initiative).
- Suppliers must provide annual conflict minerals reporting using the industry-standard Conflict Minerals Reporting Template (CMRT) or equivalent.

6. Due Diligence and Reporting

- Alaris will conduct annual due diligence on its supply chain and report findings as required by law.
- We will support and cooperate with our customers and regulatory requests for conflict minerals information.

7. Continuous Improvement

- This Policy will be reviewed annually and updated as necessary to reflect changes in law, regulation, or best practice.

8. Communication and Training

- Alaris will communicate this policy to all relevant stakeholders and provide training as appropriate.

9. Non-Compliance

- Failure by suppliers to comply with this policy may result in termination of business relationships.