

SCOPE

This policy outlines the expectations of NFI Group and persons, organizations, other entities, and their contracted workers that supply NFI Group with products or services (“Suppliers”) regarding supply chain and disclosure requirements related to conflict and critical minerals, where: the U.S. Securities and Exchange Commission (“SEC”) defines Conflict Minerals as tantalum, tin, gold, or tungsten, regardless of whether these minerals finance conflict in the DRC or adjoining countries, and the Global Battery Alliance (“GBA”) defines Critical Minerals as cobalt, nickel, lithium, and graphite.

PURPOSE

Conflict Minerals are sometimes mined and sold under the control of armed groups to finance conflict with extreme levels of violence. Critical Minerals may be mined and sold without consideration for environmental impact and without consideration of human rights. NFI Group has a long-standing commitment to respect human rights as is outlined in our Human Rights Statement, Code of Business Conduct and Ethics and Supplier Code of Conduct. NFI Group has developed this policy to address our commitments and the commitments we expect of our suppliers to support responsible mineral supply chains.

ROLES AND RESPONSIBILITIES

The Executive Vice President, Supply Management is responsible for establishing and updating this policy as required.

NFI Group employees responsible for sourcing and purchasing of products which contain Conflict Minerals and/or Critical minerals must read and act in accordance with this policy.

NFI Group Suppliers must act in accordance with this policy.

POLICY

NFI Group’s products may contain Conflict Minerals and/or Critical Minerals at some level in the supply chain. NFI Group acknowledges the importance of conducting due diligence to ensure that Conflict Minerals in our supply chain do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (“DRC”) or adjoining countries (“DRC Conflict Free”). NFI Group also acknowledges the importance of identifying and will take steps to eliminate from its supply chain components which contain Critical Minerals which are mined and sold without consideration for the environment or which put human rights at risk.

1. REQUIREMENTS OF NFI GROUP

In support of this policy, NFI Group will:

1. conduct appropriate due diligence consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD") and, in respect of Conflict Minerals, section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank") and, in respect of Critical Minerals, best practices from the GBA; and,
2. disclose publicly the use of any Conflict Minerals that originated in the DRC or adjoining countries as outlined in Dodd-Frank; and,
3. ensure that only conflict free Conflict Minerals are used in the supply chain and if conflict affected Conflict Minerals are identified, take steps to remove them; and,
4. collaborate on industry-wide initiatives to support products that are DRC Conflict Free; and,
5. commit to transparency in the implementation of this policy by annually making available reports on our progress to relevant stakeholders and the public.

2. REQUIREMENTS OF SUPPLIERS

In support of this policy, NFI Group requires its Suppliers to:

1. conduct appropriate due diligence consistent with OECD and, in respect of Conflict Minerals, Dodd-Frank, and in respect of Critical Minerals, best practices from the GBA; and,
2. provide information about their supply chain so that NFI Group can conduct due diligence with respect to whether the Conflict Minerals in our supply chain are DRC Conflict Free and Critical Minerals are mined and sold with consideration for the environment and which do not put human rights at risk; and,
3. disclose publicly and to NFI Group directly the use of any Conflict Minerals that originated in the DRC or adjoining countries as outlined in Dodd-Frank; and,
4. if conflict affected Conflict Minerals are identified in the supply chain, take steps to remove them; and,
5. collaborate on industry-wide initiatives to support products that are DRC Conflict Free.