

# Instant Brands™

## Conflict Minerals Policy

Instant Brands  
Made for together.

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## Background

The Dodd-Frank Wall Street Reform Act of 2010 (the “Act”) mandates that public companies in the U.S. provide greater supply chain transparency regarding the use of Conflict Minerals that originate from the conflict area by reporting their use of such materials. Pursuant to the Act, the U.S. Securities and Exchange Commission (“SEC”) has adopted a rule requiring publicly traded companies in the U.S. to file an annual report disclosing the extent to which products manufactured, or contracted to be manufactured, by the companies and their subsidiaries contain Conflict Minerals that (1) are necessary to the functionality or production of those products, and (2) derive from sources that are believed to finance, directly or indirectly, armed conflict or benefit armed groups within The Democratic Republic of the Congo (“DRC”) or adjoining countries (the “Covered Countries”). Under the Act, Conflict Minerals are tantalum, tin, tungsten, and gold, along with their derivatives as determined by the U.S. Department of State.

Although Instant Brands Acquisition Holdings Inc. (including its subsidiaries, collectively the “Company”) is not a public company subject to the Act, it supports the Act’s goals. The Company has established this Conflict Minerals Policy (“Policy”) to support human rights and avoid supporting armed groups in the Covered Countries.

## Policy Statement

The Company is committed to corporate responsibility and promoting human rights in its own operations and in its global supply chain. We strive to eliminate the use of Conflict Minerals contained in our products, which directly or indirectly finance or benefit armed groups in the Covered Countries. The policy is designed to conform to the internationally recognized due diligence framework created by the Organization for Economic Co-operation and Development.

Engagement with our suppliers is a fundamental element of eliminating the use of Conflict Minerals in our products. To support its Conflict Minerals commitment, the Company has adopted a Supplier Code of Conduct requiring that applicable suppliers of products containing Conflict Minerals:

- Exclude Conflict Minerals from any products that are sold to the Company and rely exclusively on Conflict-Free Minerals, that is, those that have been sourced to countries other than the DRC or an adjoining country, are produced from scrap or recycled materials, or have not been connected to the armed groups that are the focus of the Act;
- Establish Conflict Minerals policies and procedures, implement diligence frameworks and management systems, to ensure compliance with the law and the Company's policy. Require their suppliers of any tier to do the same;
- Identify, in the manner and form established by the Company and its manufacturing subsidiaries, materials or products they sell to the applicable manufacturing subsidiary and the smelter that provided the original Conflict Minerals. Direct suppliers to the Company’s manufacturing subsidiaries may have to require successive upstream suppliers to complete the Conflict Minerals survey until the smelter is identified;
- Provide reports to support the Company’s compliance with the Policy; and
- Upon request, permit the Company to audit their Conflict Minerals policies and procedures.

## Questions or Concerns

Please direct questions or concerns regarding the Company’s conflict minerals program to the Legal Department by emailing [legal@instantbrands.com](mailto:legal@instantbrands.com). When employees, contractors, and partners

observe or suspect something that conflicts with our values, we encourage them to speak up and report it. Employees and third parties may raise concerns anonymously about violations of the Company’s corporate policy with respect to the sourcing of conflict minerals via the Company’s Ethics Hotline:

- **Website:** <https://www.lighthouse-services.com/instantbrands>
- **Toll-Free Telephone:**

Australia (Optus)	1-800-551-155
Australia (Telstra)	1-800-881-011
Canada: English	844-280-0005
Canada: French	855-725-0002
Canada: Spanish	800-216-1288
China (North, Beijing CNGC)	108-888
China (South, Shanghai – China Telecom)	10-811
Japan (KDDI)	00-539-111
Japan (NTT)	0034-811-001
Japan (Softbank Telecom)	00-663-5111
Malaysia	1-800-80-0011
Mexico	01-800-681-5340
Singapore (SingTel)	800-011-1111
Singapore (StarHub)	800-001-0001
Korea, Republic (KT)	00-729-11
Korea, Republic (LGU+)	00-369-11
Korea, Republic (Sejong Telecom)	00-309-11
Korea, Republic (US Military Bases KT)	550-HOME
Korea, Republic (US Military Bases Sejong Telecom)	550-2USA
Taiwan	00-801-102-880
United Kingdom	0-800-89-0011
USA: English	844-280-0005
USA: Spanish	800-216-1288
Any Other	800-603-2869 (must dial country access code)

- **E-mail:** [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- **Fax:** (215) 689-3885 (must include company name with report)