

# Statement of Policy - Conflict Minerals

## CURTIS INDUSTRIES & FILTER NETWORKS

**Policy:** It is the policy of Curtis Industries and of Filter Networks, a Curtis Industries Company, (together the "Company"), all wholly owned by Powers Holdings, Inc., to comply as required by law with all rules and regulations governing "Conflict Minerals".

In 2010, the U.S. Dodd-Frank Act was passed concerning "Conflict Minerals" originating from the Democratic Republic of the Congo (DRC) or adjoining countries. The SEC has published final rules associated with the disclosure of the source of Conflict Minerals by U.S. publicly traded companies (see the rules at <http://www.sec.gov/rules/final/2012/34-67716.pdf>). The rules reference the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#) which guides suppliers to establish policies, due diligence frameworks, and management systems.

**Compliance Program:** The Company has established a "Conflict Minerals" Compliance Program, and it is the policy of the Company to continuously maintain the Compliance Program as a part of its commitment to the above Policy, which as a minimum includes:

1. A policy in place that includes DRC conflict-free sourcing
2. The policy is in the process of being publicly available on our website
3. Direct suppliers to be DRC conflict-free
4. Direct suppliers to source from smelters validated as compliant to a CFS protocol using the CFS Compliant Smelter List
5. Due diligence measures for conflict-free sourcing
6. Our suppliers are required to fill out a Conflict Minerals Reporting Template, or provide equivalent information in similar form
7. Smelter names from our suppliers
8. Verifying due diligence information received from our suppliers
9. A verification process that include corrective action management

As the Company moves forward with its Compliance Program, and until such time as all points listed above are completed and established within the Company, the Company will, during this interim period, provide Conflict Minerals documentation on a product line specific basis upon requests received from appropriate entities and/or their representatives.

Neither the Company nor Powers Holdings Inc. is a publicly traded company based upon SEC definition. The Company is diligent in conforming with the requirements of law regarding "Conflict Minerals" and is not subject to the SEC Conflict Minerals Disclosure Requirement rule.

Curtis Industries.

By:   
Steven J. Powers, President

2024-06-21  
date