



FUNCTIONAL AREA Policy

Policy Name:	C-100-5.1 Conflict Mineral Policy
Functional Area:	Corporate
Purpose:	To maintain the highest stand standard of ethical conduct and supports the goals of Section 1502 Dodd-Frank Wall Street Reform and Consumer Protection Act
Effective Date/Revision Date:	September 1, 2022
Responsibility:	President & COO, Phillip Vyhanek
Frequency:	Annual
Policy	
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Reviewed By:	Phillip Vyhanek
Policy Filename:	C-100-5.1 Conflict Minerals
Policy File Location:	Team/Corporation/Files



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1. Introduction and Purpose

GameChange Solar. ("GCS") is committed to responsible sourcing and operating a supply chain free of "conflict minerals", which include cassiterite, columbite-tantalite (colton), gold and wolframite and their derivatives, tin, tantalum, and tungsten (or any other mineral or its derivative determined by the Secretary of State) which are sourced from the eastern Democratic Republic of the Congo ("DRC") or an adjoining country (together, the "Conflict Region") whose extraction and trade are financing conflict in the Conflict Region. We support the goals established under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd Frank Act") on conflict minerals and condemn human rights abuses associated with the extraction, transport, or trade of minerals and any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. Similarly, GCS has a no tolerance policy with respect to corruption, money-laundering, and bribery as referenced in the C-500-3 Foreign Corrupt Practices Act Anti-Corruption Policy. Our policy is communicated to our suppliers and is incorporated into supplier contracts. GCS requires all direct suppliers to agree to and follow these principles.

2. Scope

This policy applies to all GCS products and/or product families. GCS insists all partners, subcontractors and suppliers adopt and enforce this policy as it pertains to Conflict Minerals products.

3. Guidance

GCS is committed to complying with the reporting obligations required under Section 1502 of the Dodd Frank Act and the SEC's rules on conflict minerals, including the requirement to conduct inquiries and, if necessary, due diligence into the source and chain of custody of any conflict minerals included in our products.

In support of this policy GCS: I:

- Exercise reasonable country of origin inquiries and due diligence with relevant suppliers in accordance with the OECD guidelines and require our suppliers to do likewise.
- Expect our suppliers to cooperate in providing information to confirm our supply chain is free of conflict minerals or sourced responsibly in accordance with internationally recognized due diligence guidance.



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- Implement procedure to trace Conflict Minerals at least to the smelter or refiner level and provide GCS with proper verification of the country of origin and source of the materials used in the products, materials or components supplied to GCS. Encourage suppliers to source from the Conflict Free Smelters ("CFS") program (see www.conflictreesmelter.org), when possible.
- Respond to GCS's survey requests and other in a timely manner and with full disclosure including written certifications and other information concerning the origin of conflict material.
- Reserve the right to take appropriate actions up to and including identifying an alternate source of supply or discontinuing purchases from a supplier should a supplier's efforts to comply with this policy be deficient.

GCS is committed to conducting business in compliance with applicable laws and regulations and in accordance with the highest ethical principles. We will continue to work with our major suppliers to ensure they conduct their business in line with these values. Due to the complexity of GCS's supply chain, this will be ongoing and require investment of time and resources.

4. Transparency and Reporting

GCS is committed to transparency in the implementation of this policy and will make available reports on its progress to relevant stakeholders. Any non-compliance of this policy may result in termination of contract.