

# SCIENTIFIC REFRIGERATION

Adams & Robinson Enterprises, Inc. DBA Scientific Refrigeration  
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## RESPONSIBLE MINERALS SOURCING POLICY

| Document ID | Title                                | Revision            | Effective Date |
|-------------|--------------------------------------|---------------------|----------------|
| SFR-QMS-002 | Responsible Minerals Sourcing Policy | A (Initial Release) | 28 August 2026 |

### 1.0 Purpose

Adams & Robinson Enterprises, Inc. DBA Scientific Refrigeration (“Scientific Refrigeration”) is committed to conducting business ethically and to sourcing parts and materials from suppliers who share that commitment. This policy states our position on the sourcing of minerals that may originate from conflict affected and high risk areas, and it defines the due diligence practices we apply to our supply chain.

This policy is issued so that our customers, many of whom are subject to conflict minerals reporting obligations, can rely on a documented and consistent position from Scientific Refrigeration when they conduct their own supply chain due diligence.

### 2.0 Scope

This policy applies to all Scientific Refrigeration officers, employees, and contracted personnel, and to all suppliers, distributors, and manufacturers who provide replacement parts, components, materials, or equipment used in the delivery of our service and repair operations.

Scientific Refrigeration is a service and repair organization. We do not manufacture, contract to manufacture, mine, smelt, or refine any product or material. Replacement parts are procured from original equipment manufacturers and their authorized distributors and are supplied to the customer unaltered. Our due diligence is therefore conducted at the supplier level and relies on the disclosures of the upstream manufacturers who produce those parts.

### 3.0 Covered Minerals

- For the purposes of this policy, covered minerals are:
- Conflict Minerals, commonly referred to as 3TG: tin, tantalum, tungsten, and gold, together with their ores and derivatives.
  - Extended minerals: cobalt, copper, graphite, lithium, natural mica, and nickel.
  - Additional minerals: aluminum, lead, silver, zinc, platinum group metals, rare earth elements, and any other mineral identified by a customer requirement or by emerging regulation.

*The list of covered minerals is reviewed as customer requirements and regulations evolve.*

### 4.0 Policy Statement

Scientific Refrigeration will not knowingly procure, use, or supply parts, components, or materials containing minerals that directly or indirectly finance or benefit armed groups, or that are associated with human rights abuses, forced

labor, child labor, or serious environmental harm, in the Democratic Republic of the Congo, its adjoining countries, or any other conflict affected or high risk area.

We expect every supplier of parts, components, and materials to Scientific Refrigeration to:

- Source covered minerals from smelters and refiners that have been validated as conformant under the Responsible Minerals Assurance Process (RMAP) or an equivalent independent third party audit program.
- Maintain a responsible minerals sourcing policy and a due diligence management system consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas.
- Respond to reasonable requests for country of origin, smelter, and refiner information, including completion of the current revision of the Responsible Minerals Initiative Conflict Minerals Reporting Template (CMRT), Extended Minerals Reporting Template (EMRT), and Additional Minerals Reporting Template (AMRT).
- Flow these expectations down to their own suppliers and sub tier suppliers.
- Notify Scientific Refrigeration promptly if any change in their supply chain would make a previously submitted declaration inaccurate.

Failure to meet these expectations may result in corrective action, reassignment of business to an alternate source, or removal from our approved supplier list.

## 5.0 Regulatory and Standards References

- Section 1502 of the U.S. Dodd Frank Wall Street Reform and Consumer Protection Act and the related U.S. Securities and Exchange Commission final rule, Release No. 34-67716.
- Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum, tungsten, their ores, and gold originating from conflict affected and high risk areas.
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas.
- IPC 1755, Conflict Minerals Data Exchange Standard.
- ISO 9001:2015, under which the Scientific Refrigeration quality management system is certified.

Scientific Refrigeration is a privately held company and is not itself a reporting issuer under the SEC rule, nor an importer under the EU regulation. This policy is maintained so that customers who do carry those obligations are supported by their supply base.

## 6.0 Due Diligence Framework

Our due diligence is structured on the five step framework of the OECD Due Diligence Guidance, scaled to the size and risk profile of a service organization.

### 6.1 Establish strong company management systems

- This policy is a controlled document within the Scientific Refrigeration quality management system.
- The Chief Operating Officer is the designated owner of this policy and holds responsibility for responsible minerals compliance.
- Supplier expectations are communicated during supplier onboarding and are incorporated by reference into purchase orders.
- Employees and suppliers may raise a concern regarding minerals sourcing directly to the Chief Operating Officer or through the quality management system nonconformance process, without fear of retaliation.

## 6.2 Identify and assess risk in the supply chain

- The approved supplier list is reviewed at least annually to identify suppliers reasonably likely to provide parts or materials containing covered minerals.
- Current reporting templates or written declarations are requested from those suppliers.
- A supplier that cannot or will not provide the requested information is recorded as an open risk and is evaluated for continued use.

## 6.3 Design and implement a strategy to respond to identified risks

- Findings from the supply chain review are reported to the Chief Operating Officer.
- Identified risks are ranked by severity and by the criticality of the supplier.
- The response may include a written request for corrective action, qualification of an alternate source, or suspension or discontinuation of the supplier.

## 6.4 Support independent third party audit of smelter and refiner due diligence practices

- Scientific Refrigeration holds no direct relationship with any smelter or refiner.
- We support the Responsible Minerals Assurance Process indirectly by giving preference to manufacturers and distributors who source from RMAP conformant facilities and who publish current reporting templates.

## 6.5 Report on supply chain due diligence

- This policy is made available to customers on request.
- Customer declarations and reporting templates are completed and returned within the timeframe requested, or a written explanation is provided if information is not available.

## 7.0 Supplier Requirements and Flow Down

Purchase orders and supplier agreements incorporate this policy by reference. New suppliers are asked to acknowledge it during onboarding, and existing suppliers are notified when the policy is materially revised.

This policy is administered together with SFR-QMS-001, Counterfeit and Fraudulent Parts Prevention Policy. Both policies depend on the same control, which is the traceability of every part to an original equipment manufacturer or an authorized distributor. Parts obtained from unauthorized or unverifiable sources are prohibited under both policies.

## 8.0 Corrective Action

Responsible minerals nonconformities are managed through the ISO 9001:2015 corrective action process:

- The nonconformity is documented in the quality management system.
- The supplier is notified in writing and asked to provide a written response and corrective action plan within thirty calendar days.
- The response is reviewed and, where appropriate, verified.
- An unresolved or unsatisfactory response is escalated to the Chief Operating Officer and may result in removal from the approved supplier list.

## 9.0 Records

Supplier declarations, completed reporting templates, related correspondence, and records of corrective action are retained for a minimum of five years, consistent with the record retention requirements of the quality management system.

## 10.0 Training and Communication

Personnel involved in purchasing, service parts procurement, and quality receive awareness training on this policy at hire and whenever the policy is materially revised. This policy is provided to customers and suppliers on request and is made available on the Scientific Refrigeration website.

## 11.0 Customer Declarations

Scientific Refrigeration completes the current revision of the CMRT, EMRT, and AMRT on customer request. Because we do not manufacture or contract to manufacture any product, our declarations are made at the company level and state that no covered mineral is intentionally added by Scientific Refrigeration to any product or production process.

Where a customer requires mineral content or smelter information for a specific original equipment manufacturer replacement part, Scientific Refrigeration will request that information from the manufacturer of the part and forward the response to the customer.

## 12.0 Review

This policy is reviewed at least annually as part of management review, and additionally whenever there is a material change in regulation, in the Responsible Minerals Initiative reporting templates, or in customer requirements.

## 13.0 Revision History

| Revision | Date           | Description of Change | Approved By      |
|----------|----------------|-----------------------|------------------|
| A        | 28 August 2026 | Initial release       | K. Robinson, COO |

## 14.0 Approval

| Approved By                                         | Signature                                                                            | Date            |
|-----------------------------------------------------|--------------------------------------------------------------------------------------|-----------------|
| <b>Kimberly Robinson</b><br>Chief Operating Officer |  | August 28, 2026 |