



HandyTube, LLC Conflict Minerals Compliance Statement 2026

HandyTube appreciates the opportunity to respond to your Conflict Minerals compliance and due diligence questions. This letter summarizes HandyTube's policy, scope determination, and management practices related to "conflict minerals" as defined by applicable regulations and widely adopted industry frameworks.

1) Background and Definitions

For purposes of this statement, "Conflict Minerals" refers to cassiterite (tin), columbite-tantalite (tantalum), wolframite (tungsten) and their derivatives, and gold ("3TG"), and may include additional minerals covered by customer-specific requirements. HandyTube aligns its program with the intent of the U.S. Securities and Exchange Commission Conflict Minerals Rule (Rule 13p-1 under the Securities Exchange Act of 1934), and the internationally recognized due diligence framework set forth in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Where appropriate, HandyTube also references the Responsible Minerals Initiative tools (e.g., CMRT) as an industry-standard method for collecting supplier information.

2) HandyTube's Business and Product Scope

HandyTube manufactures and supplies specialty tubing products. HandyTube is generally positioned as a downstream manufacturer and is not a miner, smelter, or refiner of 3TG. HandyTube does not source raw ores directly and does not perform smelting or refining.

Typical Materials

HandyTube's products may include stainless steels, nickel alloys, and other engineered alloys. Most of HandyTube's tubing products are metal alloys that do not intentionally incorporate 3TG as separate functional components; however, HandyTube recognizes that 3TG may be present in complex supply chains and therefore maintains a reasonable inquiry and supplier engagement process.

3) HandyTube Conflict Minerals Policy

HandyTube is committed to responsible sourcing and does not knowingly support or finance armed conflict through the procurement of minerals from conflict-affected and high-risk areas. HandyTube expects its suppliers to:

1. Maintain policies and management systems consistent with the OECD Guidance;
2. Conduct due diligence on the source and chain of custody of 3TG in products they supply;
3. Provide accurate and timely responses to reasonable inquiries, including completion of the RMI Conflict Minerals Reporting Template ("CMRT") upon request;
4. Source, where feasible, from smelters and refiners that are verified as conformant through recognized programs (e.g., RMI Responsible Minerals Assurance Process ("RMAP")) or equivalent independent third-party audit programs; and
5. Flow down these expectations to their upstream suppliers.

HandyTube evaluates supplier performance and may take corrective action, including requiring remediation plans or discontinuing business relationships, when a supplier is unwilling to support responsible sourcing expectations.

4) Governance and Internal Accountability

HandyTube's Conflict Minerals compliance activities are managed within our quality/supply chain compliance function and supported by cross-functional resources as needed (purchasing, quality, and management). Controls include:

- Supplier onboarding and qualification practices that include ethical sourcing expectations;
- Contractual and/or purchase order terms requiring regulatory compliance and truthful representations;
- Periodic supplier outreach for CMRT/related information when required by customers; and
- Document retention practices to maintain due diligence records.

5) Reasonable Country of Origin Inquiry ("RCOI") and Due Diligence Approach

HandyTube conducts a reasonable inquiry that is appropriate to its position in the supply chain and the nature of the products provided.

HandyTube's process typically includes:

1. Product/part number scoping: Determine whether the products supplied could reasonably contain 3TG (intentionally added or present in materials/components).
2. Supplier identification: Identify relevant direct suppliers of raw materials, consumables, or components that could introduce 3TG into the supplied product (e.g., brazing/preforms, plated materials, certain lubricants/coatings, or supplied components if applicable).
3. Information collection: Request CMRT (or equivalent written declaration) from those suppliers.
4. Quality checks: Review supplier submissions for completeness, internal consistency, and recency (template version, date, and declared scope).
5. Escalation and follow-up: Where information is incomplete, contradictory, or not product-specific, HandyTube requests clarification, updated CMRTs, or additional supporting documentation.
6. Risk-based evaluation: Evaluate responses for red flags (e.g., "unknown" sources, non-responsiveness, or indication of sourcing from conflict-affected areas without due diligence controls).
7. Recordkeeping: Maintain documentation of outreach and responses to support customer requests and audits.

6) Smelter/Refiner Transparency

Because HandyTube is not typically a direct purchaser from smelters/refiners and our products may not be manufactured with direct visibility to smelter-level data, HandyTube generally relies on direct supplier declarations and industry tools such as the CMRT to identify smelters/refiners within the upstream chain.

Where suppliers provide smelter/refiner lists, HandyTube encourages the use of conformant smelters/refiners validated through RMAP or equivalent audit programs. HandyTube can provide supplier CMRT(s) and/or a consolidated response to the extent received and permitted by supplier confidentiality terms.

7) Common Customer Questions and HandyTube's Responses

Below are questions that commonly arise during customer Conflict Minerals audits and how HandyTube addresses them:

Q1: Is HandyTube subject to SEC Rule 13p-1 reporting?

HandyTube is not a publicly traded issuer required to file SEC Form SD solely by virtue of manufacturing activities. However, HandyTube supports customer compliance obligations and provides relevant supply

chain information upon request.

Q2: Does HandyTube guarantee that its products are “DRC conflict free”?

HandyTube does not represent that all products are “DRC conflict free” in absolute terms unless supported by product- and supply-chain-specific evidence. HandyTube can attest to having a responsible sourcing policy and a due diligence program aligned to OECD Guidance and will provide best-available information from our suppliers.

Q3: Does HandyTube source directly from the Democratic Republic of the Congo (DRC) or adjoining countries?

HandyTube does not purchase ore or raw minerals directly. Any upstream sourcing decisions at the mine/smelter level are made by upstream entities. HandyTube’s due diligence relies on direct supplier declarations and CMRT data when available.

Q4: How does HandyTube handle “unknown” supplier responses?

HandyTube follows up with suppliers that respond “unknown” to encourage improved transparency (updated CMRT, narrowed scope to the supplied products, and/or evidence of their own due diligence controls). If a supplier remains non-responsive or cannot provide a reasonable basis for their claims, HandyTube may escalate internally and evaluate commercial/quality alternatives consistent with our supplier management practices.

Q5: Does HandyTube require suppliers to use RMAP-conformant smelters/refiners?

HandyTube encourages the use of conformant smelters/refiners and expects suppliers to conduct OECD-aligned due diligence. Depending on customer and contract requirements, HandyTube may request corrective action plans from suppliers that do not demonstrate a responsible sourcing program or that use high-risk smelters/refiners without adequate controls.

Q6: What documentation can HandyTube provide?

Subject to confidentiality obligations, HandyTube can provide:

- HandyTube’s written Conflict Minerals compliance statement (this notice);
- A list of suppliers contacted and response status (if requested);
- Policy statements or flow-down language used in purchasing terms (upon request); and
- Any product-specific declarations received from suppliers.

Q7: How often is the information updated?

HandyTube refreshes supplier declarations and CMRT information at intervals consistent with customer requirements (generally annually) or when there are significant supply chain changes (new supplier/material or product revision).

8) Training and Communication

HandyTube communicates Conflict Minerals expectations to relevant purchasing and supply chain personnel as appropriate. We also maintain awareness of evolving customer requirements and template versions (e.g., CMRT updates) and will work with customers to meet reasonable deadlines.

9) Corrective Action and Continuous Improvement

HandyTube recognizes that conflict minerals due diligence is an ongoing process. We continuously improve our program by:

- Increasing supplier response rates and specificity (product-level vs. company-level);
- Monitoring industry standards and customer requirements;
- Reinforcing flow-down expectations to suppliers; and
- Reviewing supplier risk indicators and pursuing mitigation actions where warranted.

10) Statement of Compliance

Based on HandyTube's position in the supply chain and the information available through reasonable inquiry, HandyTube affirms that it maintains a responsible sourcing policy and due diligence process intended to support compliance with applicable Conflict Minerals requirements and customer expectations.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Petrides", is written over a horizontal line.

Steve Petrides
President